



Permit

# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### PIEDMONT REGIONAL OFFICE

4949-A Cox Road, Glen Allen, Virginia 23060

(804) 527-5020 Fax (804) 527-5106

www.deq.virginia.gov

Douglas W. Domeniech  
Secretary of Natural Resources

David K. Paylor  
Director

February 9, 2010

Mr. Richard J. Tremblay  
General Manager  
Smurfit-Stone Container Corporation  
19<sup>th</sup> and Main Street  
P.O. Box 100  
West Point, VA 23181-0100

Location: West Point  
Registration No. 40126

Dear Mr. Tremblay,

Attached is a significant modification to your Title V permit to operate your facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve Smurfit-Stone Container Enterprises, Inc. – West Point of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

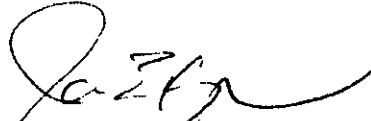
Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director  
Department of Environmental Quality  
P. O. Box 1105  
Richmond, VA 23218

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call this office at (804) 527-5020.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Kyle', with a long, sweeping horizontal line extending to the right.

James E. Kyle, P.E.  
Air Permit Manager

JEK/ROS/401260210 Title V Modification

Attachment: Permit

cc: Director, OAPP (electronic file transmission)  
Manager, Data Analysis (electronic file transmission)  
Chief, Air Enforcement Branch (3AT13), U.S. EPA, Region III  
Manager/Inspector, Air Compliance



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### PIEDMONT REGIONAL OFFICE

4949-A Cox Road, Glen Allen, Virginia 23060

(804) 527-5020 Fax (804) 527-5106

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

### Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Smurfit-Stone Container Enterprises, Inc. – West Point  
Facility Name: Smurfit-Stone Container Enterprises, Inc. – West Point  
Facility Location: 19<sup>th</sup> and Main Streets  
West Point, Virginia

Registration Number: 40126  
Permit Number: PRO40126

January 1, 2007

Effective Date

January 1, 2012

Expiration Date

February 9, 2010

Permit Amended Date

Kyle Ivar Winter P.E.  
Regional Deputy Director

Signature Date

Table of Contents, 2 pages  
Permit Conditions, 48 pages

## **Table of Contents**

<b>I. FACILITY INFORMATION</b>	<b>4</b>
<b>II. EMISSION UNITS</b>	<b>5</b>
<b>III. POWER HOUSE PROCESS AREA</b>	<b>8</b>

**THE EMISSION UNITS ASSOCIATED WITH THIS SECTION OF THE PERMIT ARE THE FOLLOWING:  
PH08, AND PH108**

A. LIMITATIONS .....	8
B. MONITORING .....	10
C. RECORDKEEPING .....	11
D. REPORTING .....	12
<b>IV. KRAFT PULPING AND BLEACHING SYSTEMS AREA</b>	<b>13</b>

**THE EMISSION UNITS ASSOCIATED WITH THIS SECTION OF THE PERMIT ARE THE FOLLOWING:  
DS01, DS03, PW01, PW02, PW03, PW05, EV02, TT03, BP01, BP02, WT01, HV01, LV01, AND CC01 13**

A. LIMITATIONS .....	13
B. MONITORING .....	15
C. RECORDKEEPING .....	17
D. TESTING .....	18
E. REPORTING .....	19
<b>V. CAUSTIC AND CHEMICAL RECOVERY PROCESS AREAS</b>	<b>20</b>

**THE EMISSION UNITS ASSOCIATED WITH THIS SECTION OF THE PERMIT ARE THE FOLLOWING:  
CZ02, CZ03, CZ11, CZ12, CR01, CR02, CR03, CR05, AND CR06 20**

A. LIMITATIONS .....	20
B. MONITORING .....	24
C. RECORDKEEPING .....	26
D. REPORTING .....	28

<b>VI. FACILITY WIDE CONDITIONS</b>	<b>29</b>
-------------------------------------	-----------

A. LIMITATIONS .....	29
B. RECORDKEEPING .....	29
C. TESTING .....	30

<b>VII. INSIGNIFICANT EMISSION UNITS</b>	<b>31</b>
--	-----------

<b>VIII. COMPLIANCE PLAN</b>	<b>36</b>
------------------------------	-----------

A. DESCRIPTION OF COMPLIANCE REQUIREMENTS .....	36
B. COMPLIANCE SCHEDULE .....	37
C. REPORTING REQUIREMENTS .....	37
D. CERTIFIED PROGRESS REPORT .....	37

<b>IX. PERMIT SHIELD &amp; INAPPLICABLE REQUIREMENTS</b>	<b>38</b>
--	-----------

<b>X. GENERAL CONDITIONS</b>	<b>40</b>
------------------------------	-----------

A. FEDERAL ENFORCEABILITY .....	40
B. PERMIT EXPIRATION .....	40
C. RECORDKEEPING AND REPORTING .....	40

D.	ANNUAL COMPLIANCE CERTIFICATION .....	41
E.	PERMIT DEVIATION REPORTING.....	42
F.	FAILURE/MALFUNCTION REPORTING.....	42
G.	SEVERABILITY .....	43
H.	DUTY TO COMPLY.....	43
I.	NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.....	43
J.	PERMIT MODIFICATION.....	43
K.	PROPERTY RIGHTS.....	43
L.	DUTY TO SUBMIT INFORMATION.....	44
M.	DUTY TO PAY PERMIT FEES .....	44
N.	FUGITIVE DUST EMISSION STANDARDS.....	44
O.	STARTUP, SHUTDOWN, AND MALFUNCTION.....	44
P.	ALTERNATIVE OPERATING SCENARIOS .....	45
Q.	INSPECTION AND ENTRY REQUIREMENTS.....	45
R.	REOPENING FOR CAUSE.....	45
S.	PERMIT AVAILABILITY.....	45
T.	TRANSFER OF PERMITS .....	46
U.	MALFUNCTION AS AN AFFIRMATIVE DEFENSE.....	46
V.	PERMIT REVOCATION OR TERMINATION FOR CAUSE.....	47
W.	DUTY TO SUPPLEMENT OR CORRECT APPLICATION.....	47
X.	STRATOSPHERIC OZONE PROTECTION .....	47
Y.	ASBESTOS REQUIREMENTS.....	47
Z.	ACCIDENTAL RELEASE PREVENTION.....	47
AA.	CHANGES TO PERMITS FOR EMISSIONS TRADING.....	47
BB.	EMISSIONS TRADING.....	47
<b>XI.</b>	<b>STATE-ONLY ENFORCEABLE REQUIREMENTS</b>	<b>48</b>
<b>XII.</b>	<b>CLEAN AIR INTERSTATE RULE (CAIR) PERMIT</b>	<b>48</b>

## **I. Facility Information**

### **Permittee/Facility**

Smurfit-Stone Container Enterprises, Inc. – West Point  
P.O. Box 100  
19<sup>th</sup> and Main Streets  
West Point, Virginia 23181

### **Responsible Official**

Richard J. Tremblay  
General Manager

### **Contact Person**

Stan Brewer  
Environmental Engineer  
(804) 843-5270

County-Plant Identification Number: 101-00001

**Facility Description:** NAICS 322130 – Paperboard Mill  
SIC 2631 – Paperboard Mill

This facility operates a Kraft pulp and paper mill which produces corrugated medium and unbleached and bleached linerboard on three paper machines using a combination of recycled paper, virgin unbleached softwood, and unbleached or bleached hardwood.

There are 11 major parts of this facility as listed in the application: 1) Power House Process Area; 2) Digester Systems Area; 3) Pulp Washing Area; 4) Caustic Recovery Process Area; 5) Chemical Recovery Process Area; 6) Evaporator System Area; 7) Turpentine & Tall Oil Plant Area; 8) Bleach Plant Process Area; 9) Paper Mill Process Area; 10) Wastewater Treatment Plant; and 11) Miscellaneous Area, including a Pulping Process Condensate Collection System.

## II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date(s)
<b>Fuel Burning Equipment</b>							
PH08	PH08-02	No. 8 Power Boiler (1964)	553 MMBtu/hr	-Andritz/Envirocare Wet Gas Scrubber - Concentric firing system (SOFA)	--	SO <sub>2</sub> , PM, PM <sub>10</sub> , Particulate HAPs, NO <sub>x</sub>	7/6/2004, 3/27/2008, 6/21/2004 (NO <sub>x</sub> Budget Permit)
PH10	PH10-04 PH10-05 PH10-06	No. 10 Power Boiler (1981)	659 MMBtu/hr	- Research Cottrell ESP - Multiclones	--	PM, PM <sub>10</sub> , Particulate HAPs	4/2/1984, 3/27/2008
PH20	--	Coal Crusher	180 ton/hr	--	--	--	3/4/2008
<b>Digester Systems Area</b>							
DS01	PH08-02 PH10-04	Batch Digester System (1950)	1,100 ADTP/day	LVHC System	LV01	Volatile HAPs	--
DS03	PH08-02 PH10-04	Kamyr Continuous Digester System (1963)	1,200 ADTP/day	LVHC System	LV01	Volatile HAPs	--
<b>Pulp Washing Area</b>							
PW01	PH08-02 PH10-04	No. 1 Pulp Washing System (1963)	1,200 ADTP/day	HVLC System	HV01	Volatile HAPs	2/1/2006
PW02	PH08-02 PH10-04	No. 2 Pulp Washing System (1971)	830 ADTP/day	HVLC System	HV01	Volatile HAPs	2/1/2006
PW03	PH08-02 PH10-04	No. 3 Pulp Washing System (1982)	600 ADTP/day	HVLC System	HV01	Volatile HAPs	2/1/2006
PW05	--	No. 1 Pulp Washing System Non-MACT Equipment	--	--	--	--	--
<b>Causticizing Area</b>							
CZ02	CZ02-17	No. 15 Lime Slaker (1974)	172,800 tons CaO/yr	- AirPol Venturi Scrubber	CZ02-CD	PM, PM <sub>10</sub>	--
CZ03	CZ03-18	No. 20 Lime Slaker (1982)	172,800 tons CaO/yr	- Ducon Size 60 Type UW4 Venturi Scrubber	CZ03-CD	PM, PM <sub>10</sub>	7/6/2004
CZ11	CZ11-15	No. 1 Lime Kiln (1956)	85 MMBtu/hr 263 tons CaO/day	- Peabody Venturi Scrubber - Demister	CZ11-CD1 CZ11-CD2	PM, PM <sub>10</sub> , Particulate HAPs	--
CZ12	CZ12-16	No. 2 Lime Kiln (1982)	90 MMBtu/hr 209 tons CaO/day	- AirPol Venturi Scrubber - Cyclone - Demister	CZ12-CD1 CZ12-CD2 CZ12-CD3	PM, PM <sub>10</sub> , Particulate HAPs	6/10/1982

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date(s)
<b>Chemical Recovery Area</b>							
CR01	CR01-07	Combustion Engineering V2R No. 4 Recovery Furnace (1975)	616.5 MMBtu/hr	- Environmental Elements Dry bottom ESP	CR01-CD1	PM, PM <sub>10</sub> , Particulate HAPs	7/6/2004
CR02	CR02-12	No. 4 North Smelt Dissolving Tank (1975)	35,542 gallons	- Flex Kleen OS-90 Venturi Scrubber - Indusco Mist Eliminator	CR02-CD	PM, PM <sub>10</sub> , TRS, Particulate HAPs	7/6/2004
CR03	CR03-13	No. 4 South Smelt Dissolving Tank (1975)	35,542 gallons	- Flex Kleen OS-90 Venturi Scrubber - Indusco Mist Eliminator	CR03-CD	PM, PM <sub>10</sub> , TRS, Particulate HAPs	7/6/2004
CR05	CR05-10	Babcock & Wilcox No. 5 Recovery Furnace (1991)	832.3 MMBtu/hr with 75% BLS 769.3 MMBtu/hr with 68% BLS 600 MMBtu/hr with No. 2 distillate oil/No. 6 residual oil	- Flakt FAA dry bottom ESP	CR05-CD	PM, PM <sub>10</sub> , Particulate HAPs	7/6/2004
CR06	CR06-14	No. 5 Smelt Dissolving Tank (1991)	45,463 gallons	- Amerex Type U4 wetted fan Scrubber	CR06-CD	PM, PM <sub>10</sub> , TRS, Particulate HAPs	7/6/2004
<b>Evaporator Systems Area</b>							
EV02	PH08-02 PH10-04	Evaporator System (4 evaporators; B-E lines dated 1939, 1956, 1977, 1991)	2 at 704,550 lbs H <sub>2</sub> O/hr 1 at 324,000 lbs H <sub>2</sub> O/hr 1 at 662,000 lbs H <sub>2</sub> O/hr	LVHC System	LV01	Volatile HAPs	--
EV05	Fugitive	E-Line Evaporator Cooling Tower	36 MMGal/day	--	--	--	--
<b>Turpentine &amp; Tall Oil Plant</b>							
TT02	TT02-143	Tall Oil System (1957)	32,690 tons Tall Oil/yr	- Schutte & Koering FIG.4010 Fume Scrubber	TT02-CD	Fumes	--
TT03	PH08-02 PH10-04	Turpentine System (1957)	--	LVHC System	LV01	Volatile HAPs	--
<b>Bleach Plant Area</b>							
BP01	BP01-88	Bleach Plant MACT Equipment (1984)	1,125 tons/day	- Packed wet scrubber	BP01-CD1 BP01-CD2	Chlorine-containing compounds	--



Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date(s)
BP02	BP02-89	Methanol Storage Tank (1993)	15,000 gal	--	--	--	--
<b>Paper Mill Area</b>							
PM01	PM01-19 thru PM01-40	Pussey & Jones/KMW No. 1 Paper Machine (1930)	600 tons/day	--	--	--	--
	PM02-41 thru PM02-64	Beloit/Valmet No. 2 Paper Machine (1964)	1,345 tons/day	--	--	--	--
PM03	PM03-65 thru PM03-86	Voith/Valmet No. 3 Paper Machine (1985)	1,345 tons/day	--	--	--	--
	PM05-87 thru PM05-90	PM Starch Handling (1989)	--	- Bin Vent Filters	PM05-CD1 PM05-CD2	PM, PM <sub>10</sub>	--
<b>Wastewater Treatment Plant</b>							
WT01	WT01-185-190	Wastewater Treatment Plant including UNOX Aeration System (1974-1996)	23 MMGal/day	--	--	Volatile HAPs	--
WT05	Fugitive	UNOX Cooling Tower	23 MMGal/day	--	--	--	--
<b>Miscellaneous</b>							
HV01	PH08-02 PH10-04	HVLC System (2005)	--	- No. 8 Power Boiler (Primary Control) - No. 10 Power Boiler (Secondary Control)	PH08-CD1 PH08-CD2 PH08-CD3 PH10-CD	Volatile HAPs	2/1/2006, 3/27/2008
LV01	PH08-02 PH10-04	LVHC System (1972)	--	- No. 8 Power Boiler (Primary Control) - No. 10 Power Boiler (Secondary Control)	PH08-CD1 PH08-CD2 PH08-CD3 PH10-CD	Volatile HAPs	7/6/2004
CC01	WT01-185-190	Condensate Collection System (1972, changes to address MACT I compliance occurred in 1996)	--	- Wastewater Treatment Plant	CC01-CD	Volatile HAPs	--

\*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

### III. Power House Process Area

The emission units associated with this section of the permit are the following: PH08, and PH10

#### A. Limitations

1. Nitrogen oxide emissions from the No. 8 Power Boiler shall be controlled by a concentric firing system (SOFA) when operating by burning coal and a Low-NO<sub>x</sub> Combustion System. Carbon monoxide emissions shall be controlled by good operation, maintenance, and combustion practices. The No. 8 Power Boiler and control devices shall be operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions and shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, 9 VAC 5-170-160, 9 VAC 5-50-20 E, 9 VAC 5-20-180, 9 VAC 5-40-20 E, Condition V.B.13 of the 11/4/04 Consent Decree, and Part I Conditions 12, 13, and 42 of the 7/6/04 PSD Permit)
2. The permittee shall maintain a plan for minimizing CO emissions and any other emission increases that may result from the use of a concentric firing system (SOFA) on No. 8 Power Boiler. The plan shall establish good operating practices and shall include requirements to demonstrate compliance with Condition III.A.12. The approved plan shall be an enforceable part of this permit. The plan may be changed or reopened without reissuance or amendment of this permit. The Director, Piedmont Region shall approve all plan changes.  
(9 VAC 5-80-110, 9 VAC 5-20-180, 9 VAC 5-50-20 E and Part I Condition 14 of the 7/6/04 PSD Permit)
3. Particulate matter emissions from the No.10 Power Boiler shall be controlled by multiclones followed by an electrostatic precipitator. Sulfur dioxide emissions shall be controlled by fuel blending. Nitrogen oxide, carbon monoxide, and volatile organic compound emissions shall be controlled by the boiler design and operation. The control devices shall be provided with adequate access for inspection and shall be in operation when the No.10 Power Boiler is operating.  
(9 VAC 5-80-110 and Part I Condition 4 of the 4/2/84 PSD Permit)
4. The approved fuels for the No. 8 Power Boiler are coal and No. 6 fuel oil. A change in the fuels may require a permit to modify and operate.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 6 of the 3/27/2008 NSR Permit)
5. The approved fuels for the No. 10 Power Boiler are woodwaste/bark/WWTP (waste water treatment plant) sludge, No. 6 fuel oil, and No. 2 fuel oil. No. 2 fuel oil shall only be used for startup purposes. A change in the fuels may require a permit to modify and operate.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 7 of the 3/27/2008 NSR Permit)
6. The coal, No. 2 fuel oil, and No. 6 fuel oil shall meet the specifications below:

#### COAL:

Maximum sulfur content per shipment: 1.8%

#### DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:

Maximum sulfur content per shipment: 0.5%

#### RESIDUAL OIL which meets the ASTM D396 specifications for number 6 fuel oil:

Maximum sulfur content per shipment: 2.2%

(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 11 of the 3/27/2008 NSR Permit)

7. No more than 25 percent of the total heat input can be supplied by oil on an annual average for No. 10 Power Boiler. The amount of oil which may be burned can vary on a monthly average but must remain within the range of 0 percent and 25 percent oil. This percentage of oil shall be calculated based upon total heat input of all fuels burned on a monthly average. Any change in the percentage of oil burned outside of these limits or to oil of a higher sulfur content requires a permit to modify and operate.

(9 VAC 5-80-110 and Condition 12 of the 4/2/84 PSD Permit)

8. A sample shall be taken from each shipment of fuel oil received by the permittee for use in No. 10 Power Boiler, and shall be analyzed for sulfur content by the permittee or his designee.

(9 VAC 5-80-110 and Condition 13 of the 4/2/84 PSD Permit)

9. The emissions of SO<sub>2</sub> from the No. 8 Power Boiler shall not exceed 4,201 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 7 of the 3/27/2008 NSR Permit)

10. The emissions of SO<sub>2</sub> from the combustion of HVLC gases in No. 10 Power Boiler shall not exceed 10 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total SO<sub>2</sub> from the combustion of HVLC gases in No. 10 Power Boiler for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. An exceedance of this limit shall require a permit to modify and operate.

(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 10 of the 3/27/2008 NSR Permit)

11. The emissions of SO<sub>2</sub> from the operation of No. 8 and No. 10 Power Boilers resulting from the combustion of LVHC non-condensable gases (NCGs) shall not exceed 71 lbs per hour and 300 tons per year.

(9 VAC 5-80-110, 9 VAC 5-50-260, and Part I Condition 38 of the 7/6/04 PSD Permit)

12. Emissions from the operation of the No. 8 Power Boiler shall not exceed the limits specified below:

Sulfur Dioxide		4,201 tons/yr
----------------	--	---------------

Nitrogen Oxides (as NO <sub>2</sub> )	0.52* lbs/MMBtu	
---------------------------------------	-----------------	--

Carbon Monoxide	68.6 lbs/hr	300.3 tons/yr
-----------------	-------------	---------------

*\*Nitrogen Oxide emissions (lbs/MMBtu) based on a 30-day rolling average basis (i.e. each 30 preceding boiler operating days).*

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-20-180, 9 VAC 5-80-1180, Condition V.B.14 of the 11/4/04 Consent Decree, Part I Condition 39 of the 7/6/04 PSD Permit, and Condition 14 of the 3/27/2008 NSR permit)

13. Emissions from the operation of the No. 10 Power Boiler shall not exceed the limits specified below:

Particulate Matter	0.1 lbs/MMBtu	65.9 lbs/hr
--------------------	---------------	-------------

Sulfur Dioxide	0.8 lbs/MMBtu	527.2 lbs/hr	2,309.1 tons/yr
----------------	---------------	--------------	-----------------

Nitrogen Oxides (as NO <sub>2</sub> )	0.3	lbs/MMBtu	197.7 lbs/hr
Carbon Monoxide	0.23	lbs/MMBtu	
Volatile Organic Compounds	0.23	lbs/MMBtu	

(9 VAC 5-80-110, 40 CFR 60.42(a)(1), 40 CFR 60.43(a)(1), 40 CFR 60.44(a)(2), Part I Condition 5 of the 4/2/84 PSD Permit, and Condition 15 of the 3/27/2008 NSR Permit)

14. Visible Emissions from the No. 10 Power Boiler shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 27 percent opacity. This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-50-80, 9 VAC 5-80-110, 40 CFR 60.42(a)(2), and Part I Condition 6 of the 4/2/84 PSD Permit)
15. Boiler emissions shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at a minimum.  
(9 VAC 5-80-110)
16. No. 10 Power Boiler shall be operated in accordance with 40 CFR 60 Subparts A and D.  
(9 VAC 5-80-110 and 40 CFR 60 Subparts A and D)

#### **B. Monitoring**

1. The permittee shall install, certify, calibrate, and operate continuous emission monitors (CEMS) to measure and record SO<sub>2</sub> emissions and NO<sub>x</sub> emissions each emitted from the No. 8 Power Boiler and No. 10 Power Boiler. All CEMS shall be maintained and calibrated in accordance with manufacturer's specifications and the applicable requirements of 40 CFR 60.13 and 40 CFR 60 Appendices A, B, and F. Records of all monitoring data and support information for these CEMS shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart and/or electronic recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, Conditions V.B.16, V.E.20, and V.F.21 of the 11/4/04 Consent Decree, Part I Condition 46 of the 7/6/04 PSD permit, and Condition 22 of the 3/27/2008 NSR Permit)
2. A continuous monitoring system for opacity (COMS) shall be installed, calibrated, maintained, and operated on No. 10 Power Boiler. The COMS shall be calibrated in accordance with 40 CFR 60.45(c)(3).  
(9 VAC 5-80-110, 40 CFR 60.45(a), and Part I Condition 6 of the 4/2/84 PSD Permit)
3. The permittee will establish a minimum excess oxygen level in the flue gas at which all emission limitations under Condition III.A.13 are met. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system for oxygen on No. 10 Power Boiler and will not operate at an oxygen level below that established in the compliance testing. The continuous monitoring system for measuring oxygen shall be maintained and calibrated in accordance with manufacturer's specifications.  
(9 VAC 5-80-110, 40 CFR 60.45(a), and Part I Condition 8 of the 4/2/84 PSD Permit)

### **C. Recordkeeping**

1. The permittee shall obtain a certification from the fuel supplier or carrier with each shipment of residual oil and coal. Each fuel supplier certification or carrier shall include the following:
  - a. The name of the fuel supplier;
  - b. The date on which the residual oil and coal was shipped;
  - c. The quantity of residual oil and coal delivered in the shipment;
  - d. A statement that the residual oil complies with the American Society for Testing and Materials specifications (ASTM D396) for number 6 fuel oil;
  - e. The sulfur content of the residual oil; and,
  - f. Documentation of sampling of the residual oil indicating the location of the fuel when the sample was taken.

Fuel sampling and analysis, independent of that used for certification, as may be periodically required or conducted by DEQ, may be used to determine compliance with the fuel specifications stipulated in Condition III.A.6. Exceedance of these specifications may be considered credible evidence of the exceedance of emission limits.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 12 of the 3/27/2008 NSR Permit)

2. The permittee shall maintain records of No. 8 and No. 10 Power Boiler emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Director. These records shall include, but are not limited to:
  - a. Annual emissions of SO<sub>2</sub> for the No. 8 Power Boiler and No. 10 Power Boiler, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. These records shall include, but are not limited to hourly SO<sub>2</sub> emissions from No. 8 Power Boiler, the periods of time when HVLC - NCGs are combusted in either Nos. 8 or 10 Power Boilers, or are bypassed to the atmosphere, and hourly calculations of SO<sub>2</sub> emissions from No. 10 Power Boiler resulting from combustion of HVLC gases. On a monthly basis, the total SO<sub>2</sub> emissions from combusting HVLC gases in No. 10 Power Boiler shall be calculated, recorded, and included into the annual SO<sub>2</sub> emission from No. 8 Power Boiler.
  - b. Monthly emissions calculations for SO<sub>2</sub> from the No. 10 Power Boiler using calculation methods approved by the Piedmont Regional Office to verify compliance with the ton/yr emissions limitations in Conditions III.A.9 and III.A.10.
  - c. Results of all stack tests, including the test to determine the emission rate of SO<sub>2</sub> resulting from the combustion of HVLC gases in No. 10 Power Boiler.
  - d. Semi-annual emission reports from the combustion of HVLC – NCGs.
  - e. Plan for minimizing CO emissions and any other emission increases that may result from the use of a concentric firing system (SOFA) on No. 8 Power Boiler, as stated in Condition III.A.2.

- f. Maintain the percentage of oil used for the No. 10 Power Boiler to comply with Condition III.A.7.
- g. Maintain all records of the fuel analysis (as stated in Condition III.A.8) and fuel certifications. In addition, the permittee shall record the time, duration, and amount of fuel oil used for all periods of start-up, shutdown, and malfunction.
- h. Scheduled and unscheduled maintenance and operator training for the No. 8 Power Boiler, No. 10 Power Boiler, and associated control devices installed on these emission units. Records of the required training shall include a statement of time, place and nature training provided. The permittee shall have available good written operating procedures and a maintenance schedule for these boilers. These procedures shall be based on the manufacturer's recommendations, at a minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-50-50, 9 VAC 5-170-160, Condition 13 of the 4/2/84 PSD Permit, Part I Condition 46 of the 7/6/04 PSD Permit, and Condition 24 of the 3/27/2008 NSR Permit)

- 3. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with the No. 8 Power Boiler CO emission limit shown in Condition III.A.12 of this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to scheduled and unscheduled maintenance, and operator training for the SOFA installed on the No. 8 Power Boiler. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9, 9 VAC 5-170-160, and Part I Condition 46 of the 7/6/04 PSD Permit)

#### **D. Reporting**

- 1. Excess emission and monitoring system performance reports shall be submitted to the Administrator semiannually for each six-month period in the calendar year for No. 10 Power Boiler. All semiannual reports shall be postmarked by the 30<sup>th</sup> day following the end of each six-month period. Each excess emission and Monitoring System Performance (MSP) report shall include the information required in §60.7(c). Periods of excess emissions and monitoring systems (MS) downtime that shall be reported are defined as follows:
  - a. Opacity: Excess emissions are defined as any six-minute period during which the average opacity of emissions exceed 20 percent opacity, except that one six-minute average per hour of up to 27 percent opacity need not be reported;
  - b. Sulfur Dioxide: Excess emissions are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) of sulfur dioxide as measured by a continuous monitoring system exceed the applicable standard under §60.43;
  - c. Nitrogen Oxides: Excess emissions are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) of nitrogen oxides as measured by a continuous monitoring system exceed the applicable standard under §60.44;

(9 VAC 5-80-110, 9 VAC 5-50-50, and 40 CFR 60.45(g))

#### **IV. Kraft Pulping and Bleaching Systems Area**

**The emission units associated with this section of the permit are the following: DS01, DS03, PW01, PW02, PW03, PW05, EV02, TT03, BP01, BP02, WT01, HV01, LV01, and CC01**

##### **A. Limitations**

1. TRS compounds in the LVHC non-condensable gases (NCGs) shall be controlled by a white liquor scrubber control system and by combustion in either No. 8 Power Boiler or No. 10 Power Boiler. A white liquor scrubber control system, designed to remove 75% by weight of the sulfur from the LVHC NCGs, shall be maintained on the NCG line upstream of both No. 8 and No. 10 Power Boilers. The "scrubbed" LVHC NCGs shall be introduced with the combustion air, with the primary fuel or into the flame zone of either No. 8 Power Boiler or No. 10 Power Boiler. The white liquor scrubber control system and either No. 8 or No. 10 Power Boiler shall be operated at any time LVHC NCGs are being produced at the mill. During periods when neither unit is operating in a manner consistent with safe and effective NCG combustion, the NCGs will vent to the atmosphere through safety devices until they can be safely rerouted and combusted in either unit.  
(9 VAC 5-80-110, 9 VAC 5-50-260, Condition V.D.18 of the 11/4/04 Consent Decree, and Part I Condition 11 of the 7/6/04 PSD Permit)
2. The Batch Digester System, the Kamyr Continuous Digester System, and the Evaporator System shall be enclosed and vented into the low-volume high-concentration (LVHC) closed-vent collection system. The Pulp Washing Systems shall be enclosed and vented into the high-volume low-concentration (HVLC) closed-vent collection system. The closed-vent collection systems shall meet the requirements stated in 40 CFR 63.450.  
(9 VAC 5-80-110 and 40 CFR 63.450)
3. Non-condensable gases (NCGs), including High-volume Low-concentration (HVLC) gases, from the facility shall be controlled by combustion within No. 8 Power Boiler as a primary control device or No. 10 Power Boiler as a backup control device. When No. 8 Power Boiler is not operating in a manner consistent with safe and effective NCG combustion, the permittee shall burn NCGs in No. 10 Power Boiler as a backup if No. 10 Power Boiler is operating in a manner consistent with safe and effective NCG combustion. During periods when neither unit is operating in a manner consistent with safe and effective NCG combustion, the NCGs will vent to the atmosphere through safety devices until they can be safely rerouted and combusted in either unit.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, Condition V.D.18 of the 11/4/04 Consent Decree, and Condition 2 of the 3/27/2008 NSR Permit)
4. The HAP emissions from the pulp washing system shall be collected and transported by the HVLC gas collection system to either No. 8 or No. 10 Power Boiler by using enclosures and closed-vent systems as specified in 40 CFR 63.450. The HVLC gas collection system shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 3 of the 3/27/2008 NSR Permit)
5. The equipment at each bleaching stage of the bleaching system where chlorinated compounds are introduced shall be enclosed and vented into a closed-vent system and routed to the Bleach Plant scrubber. The enclosures and closed-vent system shall meet the requirements specified in §63.450. The Bleach Plant scrubber used to reduce chlorinated HAP emissions shall:

- a. Reduce the total chlorinated HAP mass in the vent stream entering the control device by 99 percent or more by weight; or
  - b. Achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP; or
  - c. Achieve a treatment device outlet mass emission rate of 0.001 kg of total chlorinated HAP mass per megagram (0.002 pounds per ton) of ODP.
  - d. For the purpose, "total chlorinated HAP" does not include chloroform.  
(9 VAC 5-80-110 and 40 CFR 63.445(b) and (c))
6. The pulping process condensates from the digester systems, turpentine recovery system, evaporator systems, HVLC collection system, and the LVHC collection system shall be conveyed in a closed collection system that is designed and operated to meet the requirements specified below:
- a. The pulping process condensates shall be hard-piped to the UNOX aeration system where the outlet pipe discharging the condensates shall be below the liquid surface; and
  - b. The UNOX Aeration System Condensate collection tank shall meet the following requirements:
    - i. The fixed roof and all openings (e.g. access hatches, sampling ports, gauge wells) shall be designed and operated (when closed) with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background. The tank shall be vented into the LVHC collection system and routed to either No. 8 Power Boiler or No. 10 Power Boiler; and
    - ii. Each opening enclosure shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.
- (9 VAC 5-80-110 and 40 CFR 63.445(b) and (c))
7. The pulping process condensates from the digester systems, turpentine recovery system, evaporator systems, HVLC collection system, and the LVHC collection system shall be treated by discharging the pulping process condensate below the liquid surface of the UNOX aeration system and treat the pulping process condensates to reduce or destroy the total HAPs by at least 92 percent or more by weight.  
(9 VAC 5-80-110 and 40 CFR 63.446(e)(2))
8. The permittee has demonstrated by testing that the organic HAP emissions from its knotter and screen systems are less than the thresholds for control in 40 CFR 63.443(a)(ii); hence no control is required for these systems. If there is a significant change in organic HAP emissions from these systems, the permittee will be required to amend this permit and control organic HAP emissions from each knotter and screen system that is determined to exceed the rates specified below:

Knotter system	0.1 lbs/ton ODP
Screen system	0.2 lbs/ton ODP
<hr/>	
Combined	0.3 lbs/ton ODP



(9 VAC 5-80-110 and 40 CFR 63.443(a)(1)(ii)(A-C))

9. The bleach system shall be operated in accordance with 40 CFR 63 Subparts A and S.  
(9 VAC 5-80-110 and 40 CFR 63 Subparts A and S)
10. The pulp washing systems, digester systems, turpentine recovery system, evaporator systems, HVLC collection system, the LVHC collection system, and the wastewater treatment plant (WWTP) shall be operated in accordance with any applicable provisions of 40 CFR 63 Subparts A, S, and RR. The evaporator line E shall also be operated in accordance with 40 CFR 60 Subparts A and BB.  
(9 VAC 5-80-110, 40 CFR 60 Subparts A and BB, and 40 CFR 63 Subparts A, S, and RR)

#### **B. Monitoring**

1. The white liquor scrubber control system used to control LVHC NCGs shall be equipped with devices to continuously measure and indicate Department of Environmental Quality (DEQ) approved process parameters when the white liquor scrubber control system is in operation. All monitoring devices shall be installed, maintained, calibrated, and operated in accordance with approved procedures that shall include, as a minimum, the manufacturer's written requirements or recommendations. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the white liquor scrubber control system process parameter monitoring devices. All monitoring devices shall be provided with adequate access for inspection and shall be in operation when the white liquor scrubber control system is operating.  
(9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-50-20 C, 9 VAC 5-50-260, 9 VAC 5-50-40, and Part I Condition 20 of the 7/6/04 PSD Permit)
2. When in operation, the white liquor scrubber control system and all the DEQ approved process parameter monitoring devices shall be checked daily with measurements of the monitored process parameters noted in a log. If the readings are abnormal, the permittee shall investigate the cause, and initiate appropriate corrective action.  
(9 VAC 5-80-110, 9 VAC 5-50-50 H, and Part I Condition 22 of the 7/6/04 PSD Permit)
3. The permittee shall maintain a continuous parameter monitoring system (CPMS) shall be operated to measure the following parameters for the Bleach Plant scrubber used to comply with the bleaching system requirements of Condition IV.A.5:
  - a. The pH or the oxidation/reduction potential of the gas scrubber effluent;
  - b. The gas scrubber vent fan amperage; and
  - c. The gas scrubber liquid influent flow rate.

This CMS shall be installed, calibrated, certified, operated, and maintained according to the manufacturer's specifications. As an option to the requirements specified above, a CMS shall be operated to measure the chlorine outlet concentration of each gas scrubber used to comply with the bleaching system outlet concentration requirement specified in §63.445(c)(2).  
(9 VAC 5-80-110 and 40 CFR 63.453(a, c, d))

4. The permittee shall maintain a continuous parameter monitoring system (CPMS) for the UNOX aeration system and establish appropriate operating parameters to be monitored that demonstrate continuous compliance with the EPA approved site-specific CPMS. The following daily average indicators to be monitored will ensure that the UNOX aeration system is

functioning properly and that the intended waste is treated to reduce the total HAPs by at least 92% as required by Condition IV.A.7 of this permit.

- a. The vent gas oxygen purity shall be maintained within the range established during the initial performance test or within any range re-established during any subsequent performance test(s) described in Condition IV.D.1 of this permit;
  - b. The oxygen supply shall be maintained at a minimum flow of 5,000 scf/hr to the UNOX aeration basins or any minimum value re-established during any subsequent performance test(s);
  - c. Each of the basin mixers shall be operating and each mixer will be within the normal range of 30 to 95 amps or any range re-established during any subsequent performance test(s);
  - d. Oxygen purity shall be maintained at a minimum 99.5% or any minimum established during any subsequent performance test(s);
  - e. The operating range of each of the first three (3) indicators listed above will be continuously monitored. The oxygen purity may be either continuously monitored or the permittee may obtain certification from the supplier of the oxygen purity;
  - f. If any parameter falls outside the normal operating range, the Startup/Shutdown/Malfunction (SSM) Plan described in Condition VI.B.3 of this permit will be implemented or compliance will be demonstrated by direct measurement of methanol in the inlet and effluent process wastewater streams. If compliance is demonstrated by subsequent performance tests by direct measurement, the permittee may modify the parameter ranges described above.  
(9 VAC 5-80-110 and 40 CFR 63.453(j and n))
5. Each enclosure and closed-vent system used to comply with §63.450(a) shall comply with the requirements specified below:
- a. For each enclosure opening, a visual inspection of the closure mechanism shall be performed at least once every 30 days to ensure the opening is maintained in the same closed and sealed position as during the last performance test except when necessary to use the opening for sampling, inspection, maintenance, or repairs.
  - b. Each closed-vent system shall be visually inspected at least once every 30 days and at other times as requested by the Director, Piedmont Regional Office. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.
  - c. For positive pressure closed-vent systems or portions of the LVHC and HVLC closed-vent systems, demonstrate no detectable leaks as specified in §63.450(c) measured annually by the procedures in §63.457(d).
  - d. Demonstrate annually that each enclosure opening is maintained at negative pressure as specified in §63.457(e):
  - e. Bypass line valves that are not computer controlled and that comply using the optional seal specified in §63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

- f. If an inspection required by items a-e above identifies visible defects in ductwork, piping, enclosures or connections to covers required by §63.450, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:
  - i. A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified;
  - ii. The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

(9 VAC 5-80-110 and 40 CFR 63.453(k))

- 6. Each pulping process condensate closed collection system used to comply with §63.446(d) shall comply with the requirements specified below:
  - a. Each pulping process condensate closed collection system shall be visually inspected at least once every 30 days and at other times as requested by the Director, Piedmont Regional Office.
  - b. Bypass line valves that are not computer controlled and that comply using the optional seal specified in §63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.
  - c. The UNOX Aeration condensate feed tank used in the closed collection system shall be operated with no detectable leaks as specified in §63.446(d)(2)(i) measured annually by the procedures specified in §63.457(d);
  - d. If an inspection required by this section identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, then the corrective actions specified in §63.964(b) of subpart RR of this part shall be taken as soon as practicable.

(9 VAC 5-80-110 and 40 CFR 63.453(l))

### **C. Recordkeeping**

- 1. The permittee shall maintain records (hardcopies or electronic records) of the following for the white liquor scrubber:
  - a. The white liquor scrubber control system process parameter monitoring devices' manufacturer's recommendations on installation, maintenance, calibration, and operation and the results of maintenance and calibration of the monitoring devices;
  - b. The values (i.e. ranges) of the process parameters for the white liquor scrubber control system, as monitored during the performance tests;
  - c. The log of the daily readings of the DEQ approved monitored white liquor scrubber control system process parameters;

- d. The results of all emission/performance testing required or initiated by the permittee for similar purpose.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-50-50, 9 VAC 5-170-160, and Part I Condition 47 of the 7/6/04 PSD Permit)

- 2. The owner or operator of each affected source subject to the requirements of 40 CFR 63 Subpart S shall comply with the recordkeeping requirements of §63.10.  
(9 VAC 5-80-110 and 40 CFR 63.454(a))
- 3. For each applicable enclosure opening, closed-vent system, and closed collection system, the permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:
  - a. Date of inspection;
  - b. The equipment type and identification;
  - c. Results of negative pressure tests for enclosures;
  - d. Results of leak detection tests;
  - e. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);
  - f. The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
  - g. Repair methods applied in each attempt to repair the defect or leak;
  - h. The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
  - i. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
  - j. The date of successful repair of the defect or leak;
  - k. The position and duration of opening of bypass line valves and the condition of any valve seals; and
  - l. The duration of the use of bypass valves on computer controlled valves;(9 VAC 5-80-110 and 40 CFR 63.454(b))

#### **D. Testing**

- 1. The permittee shall conduct a performance test as specified in an EPA approved alternative monitoring procedure within 45 days after the beginning of each quarter and meet the applicable emission limit in Condition IV.A.7. The performance test conducted in the first quarter (annually) shall be performed for total HAP and meet the percent reduction or mass removal emission limit specified in Condition IV.A.7. The remaining quarterly performance

tests shall be performed as stated above of this section except owners or operators may use the applicable methanol procedure in as specified in the EPA approved alternative monitoring procedure and the value of r determined during the first quarter test instead of measuring the additional HAP to determine a new value of r.  
(9 VAC 5-80-110 and 40 CFR 63.453(j)(3))

#### **E. Reporting**

1. The permittee shall submit semi-annual reports to the Piedmont Regional Office within 30 days after the end of each calendar 6 month period. The report shall include when HVLC gases vented to the atmosphere as specified in 40 CFR 63.443(e).  
(9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-60-90, 9 VAC 5-60-100, and Condition 23 of the 3/27/2008 NSR Permit)
2. The permittee shall comply with the reporting requirements of 40 CFR 63 Subpart A.  
(9 VAC 5-80-110 and 40 CFR 63.455(a))
3. The permittee shall submit a non-binding control strategy report updated every two years (since the initial notification report specified under §63.9(b)(2) of 40 CFR 63 Subpart A), containing, at a minimum, the information specified below in addition to the information required in §63.9(b)(2) of 40 CFR 63 Subpart A:
  - a. A description of the emission controls or process modifications selected for compliance with the control requirements in this standard;
  - b. A compliance schedule, including the dates by which each step toward compliance will be reached for each emission point or sets of emission points. At a minimum, the list of dates shall include:
    - i. The date by which the major study(s) for determining the compliance strategy will be completed;
    - ii. The date by which contracts for emission controls or process modifications will be awarded, or the date by which orders will be issued for the purchase of major components to accomplish emission controls or process changes;
    - iii. The date by which on-site construction, installation of emission control equipment, or a process change is to be initiated;
    - iv. The date by which on-site construction, installation of emissions control equipment, or a process change is to be completed;
    - v. The date by which final compliance is to be achieved; and
    - vi. The date by which the final compliance tests will be performed.
  - c. Until compliance is achieved, revisions or updates shall be made to the control strategy report required indicating the progress made towards completing the installation of the emission controls or process modifications during the 2-year period.  
(9 VAC 5-80-110 and 40 CFR 63.455(b))

## V. Caustic and Chemical Recovery Process Areas

The emission units associated with this section of the permit are the following: CZ02, CZ03, CZ11, CZ12, CR01, CR02, CR03, CR05, and CR06

### A. Limitations

1. Particulate matter and PM-10 emissions from the No. 20 Slaker tank shall be controlled by a venturi impact scrubber or equivalent. The scrubber shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Part I Condition 10 of the 7/06/04 PSD Permit)
2. Particulate matter emissions from the No. 2 Lime Kiln shall be controlled by a Venturi scrubber. The scrubber shall be provided with adequate access for inspection and must be equipped with a device for continuous measurement of the pressure loss of the gas stream through the scrubber. It must also be equipped with a device to measure the scrubbing liquid supply pressure certified to be accurate within 15 percent.  
(9 VAC 5-80-110 and Part I Condition 6 of the 6/10/82 PSD Permit)
3. TRS emissions from the No. 2 Lime Kiln will be limited by ancillary equipment and good operating procedures. These may include, but are not limited to the use of a pre-coat filter, lime mud washing using fresh water, a green liquor clarifier, a white liquor clarifier, and a minimum excess oxygen concentration of 1 percent in the lime kiln.  
(9 VAC 5-80-110 and Part I Condition 7 of the 6/10/82 PSD Permit)
4. Particulate (TSP and PM<sub>10</sub>) emissions from the No. 5 recovery furnace shall be controlled by an electrostatic precipitator. Sulfur dioxide, nitrogen oxide, volatile organic compounds, TRS, and carbon monoxide emissions shall be controlled by furnace design and operation. The electrostatic precipitator shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Conditions 3, 4, 5, 6, and 7 of the 7/6/04 PSD Permit)
5. Particulate (TSP and PM<sub>10</sub>) emissions from the No. 5 smelt dissolving tank shall be controlled by a demister and a wetted fan scrubber. The system shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 8 of the 7/6/04 PSD Permit)
6. Total reduced sulfur (TRS) emissions from the No. 5 smelt dissolving tank shall be controlled by using low sulfides water in the scrubber as well as caustic when needed. The system shall be provided with adequate access for inspection.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 9 of the 7/6/04 PSD Permit)
7. The approved fuels for the No. 5 recovery furnace are black liquor containing 68% to 75% solids content, No.2 distillate fuel oil, and No. 6 residual fuel oil. Black liquor and No. 2 distillate fuel oil or black liquor and No. 6 residual fuel oil may be fired simultaneously in No. 5 recovery furnace. No. 2 distillate oil or No. 6 fuel oil shall be fired during recovery furnace start-up and shutdown.  
(9 VAC 5-80-110, 9 VAC 5-80-1800, and Condition 27 of the 7/6/04 PSD Permit)
8. The sulfur content of the No. 2 fuel oil to be burned in recovery furnace No. 5 shall not exceed 0.5 percent by weight per shipment. The permittee shall maintain written vendor certification of all oil shipments purchased indicating the sulfur content per shipment. These records shall be available on site for inspection by DEQ personnel. They shall be kept on files for the most current five-year period.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 28 of the 7/6/04 PSD Permit)

9. Recovery furnace No. 5 shall consume no more than 4,192 gallons per hour and no more than 5,065,000 gallons per consecutive twelve-month period of No. 2 distillate fuel oil (excluding start-up and shutdown). Recovery furnace No. 5 shall consume no more than 3,912 gallons per hour of No. 6 residual fuel oil (excluding start-up and shutdown).  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 30 of the 7/6/04 PSD Permit)
10. Visible emissions from the No. 4 recovery furnace shall not exceed 35% opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-80-110 and 9 VAC 5-40-1710)
11. Visible emissions from the No. 4 smelt dissolving tank vent shall not exceed 20% opacity, except for one six-minute period in any one hour of not more than 60% opacity.  
(9 VAC 5-80-110, 9 VAC 5-40-1710, and 9 VAC 5-40-80)
12. Visible emissions from the No. 5 recovery furnace shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.  
(9 VAC 5-80-110, 9 VAC 5-50-80, and Condition 40 of the 7/6/04 PSD Permit)
13. Visible emissions from the No. 5 smelt dissolving tank vent shall not exceed 20% opacity.  
(9 VAC 5-80-110, 9 VAC 5-50-80, and Condition 41 of the 7/6/04 PSD Permit)
14. Emissions from the operation of the No. 20 Slaker shall not exceed the limits specified below:
- |                    |  |           |            |
|--------------------|--|-----------|------------|
| Particulate Matter |  | 12 lbs/hr | 50 tons/yr |
| PM-10              |  | 12 lbs/hr | 50 tons/yr |
- (9 VAC 5-80-110, 9 VAC 5-50-260, and Part I Condition 36 of the 7/6/04 PSD Permit)
15. Emissions from the operation of the No. 1 Lime Kiln shall not exceed the limits specified below:
- |                    |                                  |             |               |
|--------------------|----------------------------------|-------------|---------------|
| Particulate Matter | 0.20 gr/dscf @ 10%O <sub>2</sub> | 42.8 lbs/hr | 182.3 tons/yr |
|--------------------|----------------------------------|-------------|---------------|
- (9 VAC 5-80-110, 9 VAC 5-80-110, and 40 CFR 63.865(a)(2)(iii))
16. Emissions from the operation of the No. 2 Lime Kiln shall not exceed the limits specified below:
- |                    |                                  |             |               |
|--------------------|----------------------------------|-------------|---------------|
| Particulate Matter | 0.13 gr/dscf @ 10%O <sub>2</sub> | 24.4 lbs/hr | 103.9 tons/yr |
| TRS                | 8 ppm @ 10% O <sub>2</sub>       | 1.7 lbs/hr  | 7.2 tons/yr   |
- (9 VAC 5-80-110, 40 CFR 60.282(a)(3)(ii), 40 CFR 60.283(a)(5), 40 CFR 63.865(a)(2)(iii), and Part I Condition 4 of the 6/10/82 PSD Permit, amended 10/26/82)
17. Emissions from the operation of the No. 4 recovery furnace shall not exceed the limits specified below:
- |                    |                                  |              |               |
|--------------------|----------------------------------|--------------|---------------|
| Particulate Matter | 0.035 gr/dscf @ 8%O <sub>2</sub> | 72.6 lbs/hr  | 309.3 tons/yr |
| PM <sub>10</sub>   |                                  | 72.6 lbs/hr  | 309.3 tons/yr |
| Sulfur Dioxide     |                                  | 338.3 lbs/hr | 1,441 tons/yr |

Nitrogen Oxides (as NO <sub>2</sub> )		155 lbs/hr	660 tons/yr
Carbon Monoxide		574 lbs/hr	2,446 tons/yr
Volatile Organic Compounds		101.1 lbs/hr	431 tons/yr
TRS	5 ppmdv @ 8% O <sub>2</sub>	7.5 lbs/hr	32 tons/yr

(9 VAC 5-80-110, 9 VAC 5-40-1690, 9 VAC 5-170-160, 9 VAC 5-50-190, 40 CFR 63.865(a)(2)(i), and Condition 34 of the 7/6/04 PSD Permit)

18. Emissions from the operation of the No. 4 north smelt dissolving tank shall not exceed the limits specified below:

Particulate Matter	0.75 lbs/equivalent tons of air dried pulp 0.045 gr/dscf	5.0 lbs/hr	21.3 tons/yr
PM <sub>10</sub>		5.0 lbs/hr	21.3 tons/yr

(9 VAC 5-80-110, 9 VAC 5-40-1680, 9 VAC 5-40-1690, 9 VAC 5-170-160, 40 CFR 63.865(a)(2)(ii), and Condition 35 of the 7/6/04 PSD Permit)

19. Emissions from the operation of the No. 4 south smelt dissolving tank shall not exceed the limits specified below:

Particulate Matter	0.75 lbs/equivalent tons of air dried pulp 0.110 gr/dscf	13.2 lbs/hr	56.3 tons/yr
PM <sub>10</sub>		13.2 lbs/hr	56.3 tons/yr

(9 VAC 5-80-110, 9 VAC 5-40-1680, 9 VAC 5-40-1690, 9 VAC 5-170-160, 40 CFR 63.865(a)(2)(ii), and Condition 35 of the 7/6/04 PSD Permit)

20. Emissions from the operation of the No. 4 north and south smelt dissolving tanks shall not exceed the limits specified below:

Sulfur Dioxide	0.2 lbs/ton of air dried pulp	5 lbs/hr	22 tons/yr
TRS	0.033 lbs/ton Black Liquor Solids, as H <sub>2</sub> S	1 lbs/hr	3 tons/yr

(9 VAC 5-80-110, 9 VAC 5-40-1680, 9 VAC 5-40-1690, 9 VAC 5-170-160, 40 CFR 63.865(a)(2)(ii), and Condition 35 of the 7/6/04 PSD Permit)

21. Emissions from the operation of the No. 5 recovery furnace shall not exceed the limits specified below:

Particulate Matter	0.030 gr/dscf @ 8%O <sub>2</sub>	53.3 lbs/hr	227.1 tons/yr
PM <sub>10</sub>		53.3 lbs/hr	227.1 tons/yr
Sulfur Dioxide	145 ppmdv @ 8% O <sub>2</sub>	301 lbs/hr	1,284 tons/yr



Nitrogen Oxides (as NO <sub>2</sub> )	112 ppmdv @ 8% O <sub>2</sub>	177 lbs/hr	754 tons/yr
Carbon Monoxide	250 ppmdv @ 8% O <sub>2</sub>	227 lbs/hr	969 tons/yr
Volatile Organic Compounds	0.048 lbs/MMBtu	34 lbs/hr	146 tons/yr
TRS	5 ppmdv @ 8% O <sub>2</sub>	6 lbs/hr	24 tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-280, 9 VAC 5-50-180, 40 CFR 60.282(a)(1)(i), 40 CFR 60.283(a)(2), 40 CFR 63.865(a)(2)(i), and Condition 32 of the 7/6/04 PSD Permit)

22. Emissions from the operation of the No. 5 smelt dissolving tank shall not exceed the limits specified below:

Particulate Matter	0.2 lbs/ton Black Liquor Solids (dry weight) 0.057 gr/dscf	7.9 lbs/hr	33.8 tons/yr
PM <sub>10</sub>		7.9 lbs/hr	33.8 tons/yr
Sulfur Dioxide	0.2 lbs/ton of air dried pulp	8 lbs/hr	36 tons/yr
TRS	0.0168 lbs/ton Black Liquor Solids (dry weight)	1 lbs/hr	4 tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-180, 40 CFR 60.282(a)(2), 40 CFR 60.283(a)(4), 40 CFR 63.865(a)(2)(ii), and Condition 33 of the 7/6/04 PSD Permit)

23. Emissions from the operation of the caustic and chemical recovery system shall not exceed the limits specified below:

<u>Lime Kilns</u>			
Particulate Matter	0.533 lb/ton BLS	67.2 lbs/hr	286.2 tons/yr
<u>Kraft Recovery Furnaces</u>			
Particulate Matter	0.998 lb/ton BLS	125.9 lbs/hr	536.4 tons/yr
<u>Smelt Dissolving Tanks</u>			
Particulate Matter	0.207 lb/ton BLS	26.2 lbs/hr	111.4 tons/yr
<u>Overall Limit</u>			
Particulate Matter	1.737 lb/ton BLS	219.3 lbs/hr	934.0 tons/yr

(9 VAC 5-80-110 and 40 CFR 63.865)

24. No. 1 Lime Kiln shall be operated in accordance with 40 CFR 63 Subparts A and MM.  
(9 VAC 5-80-110 and 40 CFR 63 Subparts A and MM)

25. No. 2 Lime Kiln shall be operated in accordance with 40 CFR 60 Subparts A and BB and 40 CFR 63 Subparts A and MM.  
(9 VAC 5-80-110, 9 VAC 5-50-410, 40 CFR Subparts A and BB, and 40 CFR 63 Subparts A and MM)

26. No. 4 recovery furnace and No. 4 smelt dissolving tanks (CR02 and CR03) shall be operated in accordance with 40 CFR 63 Subparts A and MM. These units will be applicable to 40 CFR Subpart BB if they are modified after September 24, 1976, and may need a permit.  
(9 VAC 5-80-110 and 40 CFR 63 Subparts A and MM)

27. No. 5 recovery furnace and No. 5 smelt dissolving tank shall be operated in accordance with 40 CFR 60 Subparts A and BB and 40 CFR 63 Subparts A and MM.  
(9 VAC 5-80-110, 9 VAC 5-50-410, 40 CFR 60 Subparts A and BB, and 40 CFR 63 Subparts A and MM)
28. The annual fossil fuel capacity factor for No. 4 recovery furnace shall not exceed 10 percent. If exceeded, No. 4 recovery furnace will be subject to 40 CFR 60 Subpart D and may need a permit.  
(9 VAC 5-80-110 and 40 CFR 60 Subpart D)
29. The annual fossil fuel capacity factor for No. 5 recovery furnace shall not exceed 10 percent. If exceeded, No. 5 recovery furnace will be subject to 40 CFR 60 Subpart Db and may need a permit.  
(9 VAC 5-80-110 and 40 CFR 60 Subpart Db)

#### **B. Monitoring**

1. A continuous emission monitoring system (CEMS) will be maintained to measure and record the concentration of TRS emissions on a dry basis and the percent oxygen by volume on a dry basis during No. 2 Lime Kiln operation. The CEMS will be properly maintained and calibrated. Monitors will be operated at all periods of operation of the No. 2 Lime Kiln. The 12 hour average TRS concentration for the two consecutive periods of each operating day will be recorded, as well as the 12 hour average oxygen concentration.  
(9 VAC 5-80-110, 40 CFR 60.284(a)(2), Part I Conditions 9 and 10 of the 6/10/82 PSD Permit, and Part II Condition 6 of the 6/10/82 PSD Permit)
2. The permittee shall calibrate, maintain, and operate a continuous opacity monitoring system (COMS) to monitor and record the opacity of the gases discharged into the atmosphere from the No. 4 recovery furnace. The COMS shall be maintained and calibrated according to the provisions in §63.6(h) and 63.8. As specified in §63.8(C)(4)(i), the COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. The COMS data must be reduced as specified in §63.8(g)(2).  
(9 VAC 5-80-110 and 40 CFR 63.864(d))
3. The permittee shall calibrate, maintain, and operate a continuous opacity monitoring system (COMS) to monitor and record the opacity of the gases discharged into the atmosphere from the No. 5 recovery furnace. The COMS shall be maintained and calibrated in accordance with performance specification No. 1 and test procedures identified in 40 CFR 60, 60.13 and Appendix B. The quality assurance of data generated by COMS shall be demonstrated by implementing or exceeding the minimum requirements for COMS quality assurance as defined in 40 CFR 60, Appendix F. A 30-day notification prior to the demonstration of continuous monitoring system performance and subsequent notification requirements, are to be submitted to the Director, Piedmont Regional Office.  
(9 VAC 5-80-110, 9 VAC 5-50-40, 40 CFR 60.284(a)(1), and Condition 15 of the 7/6/04 PSD Permit)
4. The permittee shall calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) to monitor and record the concentration of nitrogen dioxide (NO<sub>2</sub>) discharged into the atmosphere from the No. 5 recovery furnace. The CEMS shall be maintained and calibrated in accordance with performance specification No. 2 and test procedures identified in 40 CFR 60, 60.13 and Appendix B. The quality assurance of data generated by CEMS shall be demonstrated by implementing or exceeding the minimum requirements for CEMS quality assurance as defined in 40 CFR 60, Appendix F. A 30-day notification prior to the demonstration of continuous monitoring system performance and subsequent notification requirements, are to be submitted to the Director, Piedmont Regional Office.

(9 VAC 5-80-110, 9 VAC 5-50-40, and Condition 16 of the 7/6/04 PSD Permit)

5. The permittee shall calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) to monitor and record the concentration of sulfur dioxide (SO<sub>2</sub>) discharged into the atmosphere from the No. 5 recovery furnace. The CEMS shall be maintained and calibrated in accordance with performance specification No. 2 and test procedures identified in 40 CFR 60, 60.13 and Appendix B. The quality assurance of data generated by CEMS shall be demonstrated by implementing or exceeding the minimum requirements for CEMS quality assurance as defined in 40 CFR 60, Appendix F. A 30-day notification prior to the demonstration of continuous monitoring system performance and subsequent notification requirements, are to be submitted to the Director, Piedmont Regional Office.

(9 VAC 5-80-110, 9 VAC 5-50-40, and Condition 17 of the 7/6/04 PSD Permit)

6. The permittee shall calibrate, maintain, and operate continuous monitoring and recording systems to measure total reduced sulfur (TRS) concentrations and percent of oxygen by volume on a dry basis for the No. 5 recovery furnace exhaust gases. The continuous monitoring system shall be performance tested in accordance with performance specification No. 5 for TRS emission monitors, performance specification No. 3 for oxygen monitors, and with the test procedures identified in 40 CFR 60, 60.13 and Appendix B. A 30-day notification prior to the demonstration of continuous monitoring system performance and subsequent notification requirements, are to be submitted to the Director, Piedmont Regional Office.

(9 VAC 5-80-110, 9 VAC 5-50-40, 40 CFR 60.284(a)(2), and Condition 18 of the 7/6/04 PSD Permit)

7. The permittee of each affected Kraft lime kiln equipped with a wet scrubber (No. 1 Lime Kiln and No. 2 Lime Kiln) and smelt dissolving tank equipped with a wet scrubber (No. 4 north smelt dissolving tank and No. 4 south smelt dissolving tank) shall calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that can be used to determine and record the pressure drop across the scrubber and maintain, and operate a CPMS that can be used to determine and record the pressure drop across the scrubber and the scrubbing liquid flow rate at least once every successive 15-minute period using the procedures in §63.8(c). The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate to within a gage pressure of ±500 pascals (±2 inches of water gage pressure). The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate. The owner or operator of each affected source or process unit that uses an ESP or wet scrubber may monitor alternative control device operating parameters subject to prior written approval by the Administrator.

(9 VAC 5-80-110, 9 VAC 5-50-40, 40 CFR 63.860, 40 CFR 63.864(e)(10) and (13), and Condition 19 of the 7/6/04 PSD Permit)

8. The permittee shall calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) in accordance with the EPA approved alternative monitoring procedure for No. 5 smelt dissolving tank that can be used to determine and record the scrubber flow to the fan, and maintain, and operate a CPMS that can be used to determine and record the scrubbing liquid flow rate at least once every successive 15-minute period using the procedures in §63.8(c). The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate.

(9 VAC 5-80-110, 9 VAC 5-50-40, 40 CFR 63.860, 40 CFR 63.864(e)(10) and (13), and Condition 19 of the 7/6/04 PSD Permit)

9. The permittee must establish operating ranges for the monitoring parameters for emission units applicable to 40 CFR 63 Subpart MM as appropriate or the permittee may base operating ranges on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test

data used to establish the operating ranges are or have been obtained using the test methods required in Subpart MM. The permittee must certify that all control techniques and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained. The permittee must continuously monitor each parameter and determine the arithmetic average value of each parameter during each performance test. Multiple performance tests may be conducted to establish a range of parameter values.

(9 VAC 5-80-110, 40 CFR 63.860, and 40 CFR 63.864(j))

10. The permittee is required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared under Condition VI.B.3 if the monitoring exceedances stated below occur:

- a. For the No. 4 recovery furnace and No. 5 recovery furnace: When the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity;
- b. For the No. 1 Lime Kiln, No. 2 Lime Kiln, No. 4 north smelt dissolving tank, No. 4 south smelt dissolving tank, and No. 5 smelt dissolving tank: When any 3-hour average parameter value is outside the range of values established in Condition V.B.9.

(9 VAC 5-80-110 and 40 CFR 63.864(k)(1))

11. The permittee is in violation of the standards of §63.862 if the monitoring exceedances stated below occur:

- a. For the No. 4 recovery furnace and No. 5 recovery furnace: When opacity is greater than 35 percent for 6 percent or more of the operating time within any quarterly period;
- b. For the No. 1 Lime Kiln, No. 2 Lime Kiln, No. 4 smelt dissolving tanks and No. 5 smelt dissolving tank: When six or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established in Condition V.B.9.

(9 VAC 5-80-110 and 40 CFR 63.864(k)(2))

12. The permittee shall measure and record the following parameters on an hourly basis when simultaneously burning black liquor and No. 2 distillate fuel oil or black liquor and No. 6 residual fuel oil in No. 5 recovery furnace: black liquor fuel consumption in pounds/hour, percent black liquor solids content, fuel oil consumption in gallons/hour, hourly average SO<sub>2</sub> and NO<sub>x</sub> CEM readings in both ppm<sub>dv</sub> at 8% O<sub>2</sub> and pounds/hour, and other furnace operating parameters, as would be needed to show compliance with SO<sub>2</sub> and NO<sub>x</sub> emissions from the furnace. The permittee shall maintain these records at the plant site for review by DEQ personnel.

(9 VAC 5-80-110, 9 VAC 5-50-40, 9 VAC 5-50-50, and Condition 21 of the 7/6/04 PSD Permit)

### C. Recordkeeping

1. The permittee shall record and maintain records of the amounts of each fuel combusted in recovery furnace No. 5, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

(9 VAC 5-80-110 and 9 VAC 5-50-50)

2. The permittee shall calculate and record on a daily basis 12-hour average TRS concentrations for the two consecutive periods of each operating day for the No. 2 Lime Kiln and No. 5 recovery furnace. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous 1-hour average total reduced sulfur concentrations provided by

- each continuous monitoring system installed under Conditions V.B.1 and V.B.6.  
(9 VAC 5-80-110, 9 VAC 5-50-50, 9 VAC 5-50-410, and 40 CFR 60.284(c)(1))
3. The permittee shall calculate and record on a daily basis 12-hour average oxygen concentrations for the two consecutive periods of each operating day for the No. 2 Lime Kiln and No. 5 recovery furnace. These 12-hour averages shall correspond to the 12-hour average TRS concentrations under Condition V.C.2 and shall be determined as an arithmetic mean of the appropriate 12 contiguous 1-hour average oxygen concentrations provided by each continuous monitoring system installed under Conditions V.B.1 and V.B.6.  
(9 VAC 5-80-110, 9 VAC 5-50-50, 9 VAC 5-50-410, and 40 CFR 60.284(c)(2))
4. The permittee shall maintain a written plan as described in Condition VI.B.3 (for No. 1 Lime Kiln, No. 2 Lime Kiln, No. 4 recovery furnace, No. 4 north and south smelt dissolving tanks, No. 5 recovery furnace, and No. 5 smelt dissolving tank) that contains *specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards.* In addition to the information required in Condition VI.B.3, the plan must include the requirements stated below:
- a. Procedures for responding to any process parameter level that is inconsistent with the level(s) established under §63.864(j), including:
    - i. Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and
    - ii. Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance.
  - b. A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturer's instructions and recommendations for routine and long-term maintenance; and
  - c. An inspection schedule for each continuous monitoring system required under §63.864 to ensure, at least once in each 24-hour period, that each continuous monitoring system is properly functioning.  
(9 VAC 5-80-110, 40 CFR 63.866(a), and 63.6(e))
5. The permittee shall maintain records of any occurrence when corrective action is required under §63.864(k)(1), and when a violation is noted under §63.864(k)(2).  
(9 VAC 5-80-110 and 40 CFR 63.866(b))
6. In addition to the general records required by §63.10(b)(2), the owner or operator must maintain records of:
- a. Records of black liquor solids firing rates in units of Mg/d or ton/d for all recovery furnaces;
  - b. Records of CaO production rates in units of Mg/d or ton/d for all lime kilns;
  - c. Records of parameter monitoring data required under §63.864, including any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken;
  - d. Records and documentation of supporting calculations for compliance determinations

made under §63.865(a) through (d);

- e. Records of monitoring parameter ranges established for each affected source or process unit.

(9 VAC 5-80-110 and 40 CFR 63.866(c))

- 7. The permittee shall record and maintain records of the annual fossil fuel capacity factor for recovery furnace No. 4 (CR01) and recovery furnace No. 5 (CR05).

(9 VAC 5-80-110, 9 VAC 5-80-110, and 40 CFR 60 Subparts D and Db)

#### **D. Reporting**

- 1. All 12 hour average TRS concentrations above 8 ppm by volume will be reported to the Director, Piedmont Region for the No. 2 Lime Kiln semiannually.  
(9 VAC 5-80-110, 40 CFR 60.284(d)(2), and Part I Condition 11 of the 6/10/82 PSD Permit)
- 2. Quarterly written excess emission reports for TRS emissions from the No. 5 recovery furnace shall be submitted to the Director, Piedmont Regional Office. The excess emission report shall meet the requirements outlined in New Source Performance Standard 40 CFR 60.284(d), (Subpart BB).  
(9 VAC 5-80-110, 9 VAC 5-50-50, and Condition 48 of the 7/6/04 PSD Permit)
- 3. Quarterly written excess emission reports for NO<sub>x</sub> and SO<sub>2</sub> emissions from the No. 5 recovery furnace shall be submitted to the Director, Piedmont Regional Office.  
(9 VAC 5-80-110, 9 VAC 5-50-50, and Condition 49 of the 7/6/04 PSD Permit)

- 4. The permittee shall notify the Administrator before any of the actions stated below are taken:
  - a. The air pollution control system for any process unit is modified or replaced;
  - b. The No. 1 and No. 2 Lime Kilns, No. 4 and No. 5 recovery furnaces, and the No. 4 and No. 5 smelt dissolving tanks are shut down for more than 60 consecutive days;
  - c. A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed; or
  - d. The black liquor solids firing rate for the No. 4 and No. 5 recovery furnaces during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.

If any of these actions are taken, the permittee must recalculate the overall PM emission limits for the group of process units and resubmit the documentation required in 40 CFR 63.867(b)(2) to the Administrator. All modified PM emission limits are subject to approval by the Administrator.

(9 VAC 5-80-110, 9 VAC 5-50-50, and 40 CFR 63.867(b))

- 5. The permittee shall report quarterly if measured parameters meet any of the conditions specified in paragraph (k)(1) or (2) of §63.864. This report must contain the information specified in §63.10(c) of this part as well as the number and duration of occurrences when the source met or exceeded the conditions in §63.864(k)(1), and the number and duration of occurrences when the source met or exceeded the conditions in §63.864(k)(2). When no exceedances of parameters have occurred, the owner or operator must submit a semiannual report stating that no excess emissions occurred during the reporting period.  
(9 VAC 5-80-110, 9 VAC 5-50-50, and 40 CFR 63.867(c))

## VI. Facility Wide Conditions

### A. Limitations

1. Each emission unit at the Kraft pulp mill shall not operate more than the equivalent of 8,520 hours per year at design capacity.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 25 of the 7/6/04 Permit)
2. The sulfur content of the No. 6 fuel oil to be burned in the Kraft pulp mill facility shall not exceed 2.2% by weight per shipment. Permittee shall maintain records of all oil shipments purchased indicating the sulfur content per shipment. These records shall be available on site for the most current five-year period.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 29 of the 7/6/04 Permit)
3. The annualized average pulp production rate of the mill shall not exceed 1,800 air dried tons (ADT) per day and the batch pulp production rate shall not exceed 1,100 ADT of batch pulp per day. Annualized average pulping production shall be determined monthly based on each previous consecutive 12 month period. The permittee shall maintain documentation of daily pulping production data to verify that pulping production limits are not exceeded.  
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 26 of the 7/6/04 Permit)

### B. Recordkeeping

1. The permittee shall maintain monthly hours of operation of each emission unit at the Kraft pulp mill for which an applicable emission limit has been established.  
(9 VAC 5-80-110)
2. Daily written records of batch digester pulp production and of total mill pulp production shall be maintained at the plant site. On a monthly basis, a rolling annual average of pulp production shall be calculated and recorded for the batch pulping process and for total mill pulping. The permittee shall submit a quarterly excess pulp production report to the Director, Piedmont Regional Office when any permitted pulping production limitation is exceeded.  
(9 VAC 5-80-110, 9 VAC 5-170-160, and Condition 45 of the 7/6/04 PSD Permit)
3. The permittee shall maintain a written startup, shutdown, and malfunction (SSM) plan as stated in §63.6(e) that describes, in detail, procedures for operating and maintaining the affected sources shown below during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control and monitoring equipment used to comply with the relevant standards limited by this permit:

Emission Unit ID	Equipment	MACT
DS01	Batch Digester System	Subpart S
DS03	Kamyr Continuous Digester System	Subpart S
PW01	No. 1 Pulp Washing System	Subpart S
PW02	No. 2 Pulp Washing System	Subpart S
PW03	No. 3 Pulp Washing System	Subpart S
EV02	Evaporator System	Subpart S
BP01	Bleach Plant MACT Equipment	Subpart S
CR01	No. 4 Recovery Furnace	Subpart MM
CR02	No. 4 North Smelt Dissolving Tank	Subpart MM
CR03	No. 4 South Smelt Dissolving Tank	Subpart MM
CR05	No. 5 Recovery Furnace	Subpart MM
CR06	No. 5 Smelt Dissolving Tank	Subpart MM
CZ11	No. 1 Lime Kiln	Subpart MM
CZ12	No. 2 Lime Kiln	Subpart MM

LV01	LVHC Collection System	Subpart S
HV01	HVLC Collection System	Subpart S
CC01	Condensate Collection System	Subpart S
WT01	UNOX Aeration System	Subpart S

(9 VAC 5-80-110 and 40 CFR 63.6(e))

4. The permittee shall develop and implement a continuous control monitoring system (CMS) quality control program for monitoring devices described in the startup, shutdown, and malfunction plan required by Condition VI.B.3 of this permit. As part of the quality control program, the permittee shall develop and submit to the Director, Piedmont Regional Office for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation that includes the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external QA program. Data quality objectives are the pre-evaluation expectations of precision, accuracy, and completeness of data. In addition, each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations:
  - a. Initial and any subsequent calibration of the CMS;
  - b. Determination and adjustment of the calibration drift of the CMS;
  - c. Preventive maintenance of the CMS, including spare parts inventory;
  - d. Data recording, calculations, and reporting;
  - e. Accuracy audit procedures, including sampling and analysis methods; and,
  - f. Program of corrective action for a malfunctioning CMS.

(9 VAC 5-80-110 and 40 CFR 63.8(d)(2))
5. The permittee shall keep these written quality control procedures on record for the life of the affected sources listed in Condition VI.B.3 of this permit or until the source is no longer subject to the provisions of this permit, to be made available for inspection, upon request, by the Director, Piedmont Regional Office. If the performance evaluation plan is revised, the permittee shall keep previous (i.e. superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Director, Piedmont Regional Office, for a period of 5 years after each revision to the plan described in Condition VI.B.4 of this permit. Where relevant, e.g. program of corrective action for a malfunctioning CMS, these written procedures may be incorporated as part of the affected source's startup, shutdown, and malfunction plan to avoid duplication of planning and recordkeeping efforts.
 

(9 VAC 5-80-110 and 40 CFR 63.8(d)(3))

### C. Testing

1. The permitted facility shall be designed and constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
 

(9 VAC 5-80-110, 9 VAC 5-50-30, 9 VAC 5-60-30, and Part II Condition 2 of the 7/6/04 Permit)



## VII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
DS00	Black/White Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	1,320 gallons
DS00	White Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	2,256 gallons
DS02	Chip Hopper	Emissions 9 VAC 5-80-720 B	PM, VOC	Not Applicable
DS02	Pre-Steamng Vessel	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
DS02	Sand Separator	Emissions 9 VAC 5-80-720 B	VOC	900 gallons
DS02	Dump Tank	Emissions 9 VAC 5-80-720 B	VOC	1,320 gallons
PW00	Reclaim Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	N. Cold Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	S. Cold Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	N. Hot Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	S. Hot Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	Broke Thickener Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	24,000 gallons
PW00	White Pine Chest	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW01	Hardwood Primary Supply	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	30,550 gallons
PW03	Filtrate Tank No. 1	Emissions 9 VAC 5-80-720 B	VOC	238,313 gallons
PW03	Foam Breaker No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW03	Defoamer Storage Tank	Emissions 9 VAC 5-80-720 B	VOC	9,930 gallons
PW04	#2 Line Pri Rej A/B Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	#3 Line Pri Scrn Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	#3 Line Pri Rej A Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	#3 Line Pri Rej B Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	Pri Screen Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	33.680 gallons
PW04	Secondary Knotter	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	Sand Separator Supply Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	4,700 gallons
PW04	Knots to Chip Bin	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
EV01	WBL Tank Vents (Hardwood)	Emissions 9 VAC 5-80-720 B	VOC	204,751 gallons
EV01	WBL Tank Vents (Softwood)	Emissions 9 VAC 5-80-720 B	VOC	1,142,139 gallons

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
EV01	A-D Line Evap Cond Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	E Line Evap Cond Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	A-Line Soap Skim Tank #1	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
EV01	A-Line Soap Skim Tank #2	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
EV01	A-Line Horizontal Soap Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	7,074 gallons
EV01	B-Line Soap Skim Tank #1	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	23,135 gallons
EV01	B-Line Soap Skim Tank #2	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	23,135 gallons
EV01	C-Line Soap Skim Tank #1	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	21,813 gallons
EV01	C-Line Soap Skim Tank #2	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	23,135 gallons
EV01	Soap Skimming Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	62,108 gallons
EV01	Soap Holding Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	3,023 gallons
EV01	Common Soap Holder Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
EV01	Soap Skim Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	159,389 gallons
EV01	Soap Collection Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	4,847 gallons
EV01	Soap Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	8,800 gallons
EV01	Heavy BL Tank Vent	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	75% BL Tank Vents (2)	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	Black Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	50% Black Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	Weak Liquor Boilout Tank	Emissions 9 VAC 5-80-720 B	VOC	310,817 gallons
EV03	Liquor Pond	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CR00	Smelt Cooling Tower, Smelt Spout Suction A	Emissions 9 VAC 5-80-720 B	VOC	800 gallons
CR00	Cooling Water Reclaim	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	800 gallons
CR07	RF5 #2 Fuel Day Tank	Emissions 9 VAC 5-80-720 B	VOC	50,000 gallons
CR07	RF4 #6 Fuel Oil Day Tank	Emissions 9 VAC 5-80-720 B	VOC	35,547 gallons
CZ01	Green Liquor Clarifier	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	587,556 gallons
CZ04	Causticizer No. 11	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	42,304 gallons
CZ04	Causticizer No. 12	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	42,304 gallons
CZ04	Causticizer No. 13	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	42,304 gallons
CZ05	Dregs Precoat Filter	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
CZ05	Dregs Filter Vacuum Pump	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ05	Dregs Filter Receiver Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	187 gallons
CZ07	White Liquor Clarifier A	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier B	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier C	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ08	Port Richmond Storage Tank	Emissions 9 VAC 5-80-720 B	VOC	2,350,225 gallons
CZ08	Weak Wash Tank Small	Emissions 9 VAC 5-80-720 B	VOC	5,876 gallons
CZ08	Weak Wash Tank Large	Emissions 9 VAC 5-80-720 B	VOC	99,150 gallons
CZ08	White Liquor Day Tank	Emissions 9 VAC 5-80-720 B	VOC	168,922 gallons
CZ08	West Mudwasher Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Available
CZ08	South Mudwasher Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	3,008 gallons
CZ08	Mudwasher	Emissions 9 VAC 5-80-720 B	VOC	925,401 gallons
CZ08	Mud Storage Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	255,102 gallons
CZ08	No. 1 Weak Wash Surge Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	No. 2 Weak Wash Surge Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	Weak Wash Fill Back Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	No. 1 Mud Filtrate Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ08	No. 2 Mud Filtrate Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	3,008 gallons
CZ08	Scrubber Sump Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ08	Weak White Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	Mud Mix Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	3,008 gallons
CZ08	Kiln Reused Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	VOC	1,760 gallons
CZ08	Mud Washer Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	8,565 gallons
CZ08	Strong Waste Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	1,006,190 gallons
CZ08	T.C. Cooling Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	Not Applicable
CZ08	Sodium Hypochlorate	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ09	Lime Mud Precoat Filters	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ10	Lime Mud Precoat Vacuum Pumps	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
BP00	Emergency Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	Not Applicable
BP00	Saltcake Filter	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Separator Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Saltcake Slurry Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Generator Dump Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Indirect Cooler H-12	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	CLO2 Absorption Tower	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Vacuum Seal Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Surface Condenser	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	S-10 Vent Scrubber	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Vent Scrubber Seal Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Sampling Chamber	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Sulfuric Acid Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Strong Waste Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP03	50% Caustic Tank No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	20,000 gallons
BP03	50% Caustic Tank No. 2	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	26,520 gallons
BP03	Sodium Chlor. Mix Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
BP03	7% Caustic Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	5,865 gallons
BP03	Sodium Chlor. Unloading	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	40,000 gallons
BP03	Sulfuric Acid Tank No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	26,520 gallons
BP03	Sulfuric Acid Tank No. 2	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PM04	PM Additives Handling	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PM07	Epsom Salt Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	2,500 gallons
PM07	White Water Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PM07	T.C. Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PM07	T.C. Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	Not Applicable
PM07	Raw Aluminum Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	20,000 gallons
PM07	No. 1 Starch Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	455,000 lb.
PM07	No. 2 Starch Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	455,000 lb.
PM07	Sodium Hypochlorite	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
TT01	Brine Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	45,688 gallons
TT01	Wet Oil Tanks (3)	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT01	Dry Oil Tank	Emissions 9 VAC 5-80-720 B	VOC	45,680 gallons
TT01	Green Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	310,817 gallons
TT01	#1 Skimming Stlg Tank	Emissions 9 VAC 5-80-720 B	VOC	225,621 gallons
TT01	#2 Skimming Stlg Tank	Emissions 9 VAC 5-80-720 B	VOC	225,621 gallons
TT01	Sulfuric Acid Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	24,066 gallons
TT01	Tall Oil Soap Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	21,152 gallons
TT01	Liquid Caustic Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	2,256 gallons
TT01	Caustic Liquor Hook-up Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
TT01	Turpentine Tank No. 1	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT01	Turpentine Tank No. 2	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT01	Turpentine Condenser	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT03	Turpentine Catch-All	Emissions 9 VAC 5-80-720 B	VOC	212 gallons
PH00	Horizontal Mix Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PH00	Reclaimed Caustic Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	12,000 gallons
PH00	T.C. Water Tank West	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH00	T.C. Water Tank East	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH11	Demineralized Water	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH11	Demineralized Water	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH12	Caustic Tank No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	7,820 gallons
PH12	Caustic Tank No. 2	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	7,820 gallons
PH 13	Fuel Oil Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PH13	Oil Storage Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PH13	No. 2 Diesel Tank	Emissions 9 VAC 5-80-720 B	VOC	4,000 gallons
PH13	Diesel Fuel Tank	Emissions 9 VAC 5-80-720 B	VOC	4,000 gallons
PH13	No. 2 Diesel Tank	Emissions 9 VAC 5-80-720 B	VOC	10,575 gallons
PH13	PB8 #6 Fuel Oil Day Tank	Emissions 9 VAC 5-80-720 B	VOC	17,774 gallons
PH13	Fuel Oil Tank	Emissions 9 VAC 5-80-720 B	VOC	1,729,766 gallons
PH13	PB9 #6 Fuel Oil Day Tank	Emissions 9 VAC 5-80-720 B	VOC	17,627 gallons

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PH13	Horiz. Diesel Fuel No. 1	Emissions 9 VAC 5-80-720 B	VOC	16,529 gallons
PH13	Horiz. Diesel Fuel No. 2	Emissions 9 VAC 5-80-720 B	VOC	20,941 gallons
PH13	Horiz. Diesel Fuel No. 3	Emissions 9 VAC 5-80-720 B	VOC	17,627 gallons
PH13	Waste Oil Tank No. 1	Emissions 9 VAC 5-80-720 B	VOC	2,850 gallons
PH13	Waste Oil Tank No. 2	Emissions 9 VAC 5-80-720 B	VOC	2,850 gallons
PH13	Oil Water Sep. Tank	Emissions 9 VAC 5-80-720 B	VOC	660 gallons
PH13	Oil Accumulation Tank	Emissions 9 VAC 5-80-720 B	VOC	284 gallons
PH13	No. 12 Turbine Cooling Tower	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
WT01	Defoamer No. 1	Emissions 9 VAC 5-80-720 B	VOC	6,500 gallons
WT01	Defoamer No. 2	Emissions 9 VAC 5-80-720 B	VOC	7,048 gallons
WT01	Liquid Caustic Soda	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Available
WT01	Ferric Sulphate Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Available
PS01	HD Unbl Softwood Tanks	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	HD Unbl Hardwood Tanks	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 1 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 2 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 3 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 4 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 5 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
SF01	Secondary Fiber Plant	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
SF01	Secondary Fiber Dilution	Emissions 9 VAC 5-80-720 B	VOC	24,000 gallons
SF01	Fiber Leveling Chest	Emissions 9 VAC 5-80-720 B	VOC	Not Available

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

## VIII. Compliance Plan

### A. Description of Compliance Requirements

The permittee is subject to the compliance schedule described below. The schedule includes a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule resembles and is at least as stringent as that contained in any judicial consent decree or Board order to which the source is subject. This schedule is supplemental to, and does not sanction noncompliance with the applicable requirements upon which it is based.

(9 VAC 5-80-90 I.3.c)

## **B. Compliance Schedule**

1. On or before one hundred and eighty (180) days after the permittee commences operation of the Wet Gas Scrubber (WGS) to reduce emissions of SO<sub>2</sub> from the stack for No. 8 Power Boiler:
  - a. The permittee shall operate the WGS at all times the No. 8 Power Boiler is in operation, consistent with and except as provided in 9 VAC §§ 5-10-10, 5-10-20, 5-20-180, and 5-40-10 to 5-40-50, as applicable.
  - b. The permittee shall operate the No. 8 Power Boiler and WGS to achieve a SO<sub>2</sub> emission rate not to exceed 0.26 lb/MMBtu on a 30-day rolling average basis (i.e. each 30 preceding boiler operating days). The SO<sub>2</sub> emission limit specified shall apply consistent with and except as provided in 9 VAC §§ 5-10-10, 5-10-20, 5-20-180, and 5-40-10 to 5-40-50, as applicable. The permittee shall begin monitoring emission levels for purposes of the 30-day rolling average.
  - c. The permittee shall use the Continuous Emission Monitoring System (CEMS) and the F-factor calculations to monitor SO<sub>2</sub> emissions from No. 8 Power Boiler. The permittee shall use the CEMS and the F-factor calculations (which were developed by the permittee in accordance with 40 CFR Part 60 Appendix A-7, Method 19) at the No. 8 Power Boiler to monitor emissions from No. 8 Power Boiler and to report compliance with the terms and conditions of the 11/4/04 Consent Decree. The permittee shall retain SO<sub>2</sub> and oxygen concentration data from the CEMS at the No. 8 Power Boiler in accordance with the requirements of Section IX (Recordkeeping from the 11/4/04 Consent Decree) herein and shall make such data available to EPA and VDEQ upon request.
  - d. The permittee shall conduct stack tests on the No. 8 Power Boiler for the purpose of determining SO<sub>2</sub> emission rates in accordance with test methods and procedures approved by VDEQ, after VDEQ consultation with EPA.
2. On or before November 4, 2008, the permittee shall complete installation and begin operation of a SO<sub>2</sub> ambient air monitoring station at a site and in accordance with procedures determined in conjunction with the VDEQ. The permittee shall arrange for and finance the operation and maintenance of the SO<sub>2</sub> ambient air monitoring station for five (5) years from the date the permittee commences operation of such monitoring station.

(9 VAC 5-80-110 K.3)

## **C. Reporting Requirements**

Within 14 days of the dates provided in Compliance Schedule above, the permittee shall provide written confirmation that the milestone has been achieved. If the milestone is not achieved by the date required in the compliance schedule, the source shall, within 14 days of the date, provide a written explanation of the reason the compliance date was not met, a proposed alternate date and a statement as to the impact on the final compliance date. Extension of a compliance date may be cause for modification of this permit.

(9 VAC 5-80-110 K.4)

## **D. Certified Progress Report**

The permittee shall submit a certified progress report quarterly detailing the progress made toward completion of the milestones in Compliance Schedule above. The progress report must be certified by a responsible official and shall contain the following:

1. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
2. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

(9 VAC 5-80-90 I.4 and 9 VAC 5-80-110 K.4)

## IX. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	This Subpart does not apply to No. 8 Power Boiler since the construction of this unit commenced before August 17, 1971. This Subpart does not apply to the No. 5 recovery furnace since it is exempt in 40 CFR 60.40b(j). This Subpart does not apply to the No. 4 recovery furnace since it has an annual fossil fuel capacity factor of less than 10%.
40 CFR 60, Subpart D NO <sub>x</sub> Monitoring in §60.45(a)	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	This monitoring requirement does not apply to the No. 10 Power Boiler since the mill was not required to install a NO <sub>x</sub> CEMS pursuant to 40 CFR 60.45(b)(3).
40 CFR 60, Subpart D SO <sub>2</sub> Monitoring in §60.45(a)	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	This monitoring requirement does not apply to the No. 10 Power Boiler since the mill was not required to install a SO <sub>2</sub> CEMS pursuant to 40 CFR 60.45(b)(2).
40 CFR 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978	This Subpart does not apply to the No. 8 Power Boiler, No. 10 Power Boiler, No. 4 recovery furnace, and No. 5 recovery furnace since these units do not meet the definition of an "electric utility steam generating unit."
40 CFR 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	This Subpart does not apply to the No. 8 Power Boiler, No. 10 Power Boiler, and No. 4 recovery furnace since the construction of these units commenced before June 19, 1984. This Subpart does not apply to the No. 5 recovery furnace since it has an annual fossil fuel capacity factor of less than 10%.



40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	This Subpart does not apply to any of the listed storage tanks that store volatile organic liquids since all are below the exemption levels listed in the Subpart.
40 CFR 60, Subpart O	Standards of Performance for Sewage Treatment Plants	This Subpart does not apply to the No. 10 Power Boiler since the facility's wastewater treatment plant is not a municipal sewage treatment plant.
40 CFR 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	This Subpart does not apply to the No. 1 Lime Kiln, No. 4 recovery furnace, No. 4 smelt dissolving tanks, digester systems, pulp washing systems, and evaporator lines B, C, and D since the construction of these units commenced before September 24, 1976.
40 CFR 60, Subpart HH	Standards of Performance for Lime Manufacturing Plants	This Subpart does not apply to the No. 1 Lime Kiln and No. 2 Lime Kiln since they are exempt by 40 CFR 60.340(b).
40 CFR 63, Subpart Q	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	This Subpart does not apply to the wastewater treatment plant since the facility does not use chromium based water treatment chemicals.
40 CFR 63, Subpart S Standards in §63.443(a)(1)(ii)(A-C)	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	This standard does not apply to the pulp washing area deckers, knotters, and screen systems since they are below the specified HAP thresholds listed in this standard.
40 CFR 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry	This Subpart does not apply to the facility since the facility does not conduct any printing operations.
40 CFR 63, Subpart JJJJ	National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating	This Subpart does not apply to the facility since the facility does not conduct any paper coating operations.
40 CFR 72	Acid Rain Program	This program does not apply to the No. 8 Power Boiler and No. 10 Power Boiler since they are exempt by 40 CFR 72.6(b)(4).

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.  
(9 VAC 5-80-140)

## **X. General Conditions**

### **A. Federal Enforceability**

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.  
(9 VAC 5-80-110 N)

### **B. Permit Expiration**

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

### **C. Recordkeeping and Reporting**

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
  - a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.

- f. The operating conditions existing at the time of sampling or measurement.  
(9 VAC 5-80-110 F)
2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.  
(9 VAC 5-80-110 F)
3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1 and September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
  - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
  - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
    - i. Exceedance of emissions limitations or operational restrictions;
    - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
    - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
  - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

#### **D. Annual Compliance Certification**

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.
4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.
7. One copy of the annual compliance certification shall be sent to EPA at the following address:  
Clean Air Act Title V Compliance Certification (3AP00)  
U. S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029.  
(9 VAC 5-80-110 K.5)

**E. Permit Deviation Reporting**

The permittee shall notify the Director, Piedmont Region within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3. of this permit.  
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

**F. Failure/Malfunction Reporting**

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Region.

1. The emission units that have continuous monitors subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not subject to the 14 day written notification.
2. The emission units subject to the reporting and the procedure requirements of 9 VAC 5-40-50 C and the procedures of 9 VAC 5-50-50 C are listed below:
  - a. No. 8 Power Boiler
  - b. No. 10 Power Boiler
  - c. No. 4 Recovery Furnace
  - d. No. 5 Recovery Furnace
  - e. No. 1 Lime Kiln

- f. No. 2 Lime Kiln
3. Each owner required to install a continuous monitoring system subject to 9 VAC 5-40-41 or 9 VAC 5-50-410 shall submit a written report of excess emissions (as defined in the applicable emission standard) to the board for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include the following information:
  - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 9 VAC 5-40-41 B 6, any conversion factors used, and the date and time of commencement and completion of each period of excess emissions;
  - b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the source. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted;
  - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and
  - d. When no excess emissions have occurred or the continuous monitoring systems have not been inoperative, repaired or adjusted, such information shall be stated in the report.

All malfunctions of emission units not subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C require written reports within 14 days of the discovery of the malfunction.  
(9 VAC 5-20-180 C, 9 VAC 5-40-50, and 9 VAC 5-50-50)

**G. Severability**

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.  
(9 VAC 5-80-110 G.1)

**H. Duty to Comply**

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9 VAC 5-80-110 G.2)

**I. Need to Halt or Reduce Activity not a Defense**

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
(9 VAC 5-80-110 G.3)

**J. Permit Modification**

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9 VAC 5-80-190 and 9 VAC 5-80-260)

**K. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

**L. Duty to Submit Information**

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

**M. Duty to Pay Permit Fees**

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

**N. Fugitive Dust Emission Standards**

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

**O. Startup, Shutdown, and Malfunction**

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution

control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

**P. Alternative Operating Scenarios**

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

**Q. Inspection and Entry Requirements**

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

**R. Reopening For Cause**

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

**S. Permit Availability**

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the

premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.  
(9 VAC 5-80-150 E)

**T. Transfer of Permits**

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.  
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)

**U. Malfunction as an Affirmative Defense**

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
  - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
  - b. The permitted facility was at the time being properly operated.
  - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
  - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
  - e. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.



- f. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

**V. Permit Revocation or Termination for Cause**

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

**W. Duty to Supplement or Correct Application**

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

**X. Stratospheric Ozone Protection**

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

**Y. Asbestos Requirements**

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).

(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

**Z. Accidental Release Prevention**

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

**AA. Changes to Permits for Emissions Trading**

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

**BB. Emissions Trading**

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

#### **XI. State-Only Enforceable Requirements**

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Odor (9 VAC 5 Chapter 40, Article 2)
2. State toxics rule (9 VAC 5 Chapter 60)

#### **XII. Clean Air Interstate Rule (CAIR) Permit**

The permittee shall comply with all applicable CAIR requirements (9 VAC 5-140-2010 et seq.) by the compliance date in the respective Part of 9 VAC 5 Chapter 140, as contained in the CAIR Permit, which is the CAIR permit application (Appendix A) dated September 15, 2009 for Power Boiler No. 8.

Appendix A

CAIR Permit Application dated September 15, 2009 for Power Boiler No. 8

The CAIR Permit Application dated June 27, 2007 for Recovery Furnace No. 4 and Power Boiler No. 10 has been removed because these units qualify as cogeneration units under 9 VAC 5-140-1020 and 40 CFR 51.123 (cc) and are exempt from CAIR. Although Recovery Furnace No. 5 was not listed in the June 27, 2007 CAIR application, this unit also qualifies as a cogeneration unit and is exempt from CAIR.

# Appendix A



Smurfit-Stone Container Enterprises, Inc.  
doing business as  
Smurfit-Stone Container Corporation  
19<sup>th</sup> and Main Street  
P.O. Box 100  
West Point, VA 23181-0100  
804-843-5000  
804-843-5757 fax

September 15, 2009

Mr. James E. Kyle  
Air Permit Manager  
Commonwealth of Virginia  
Department of Environmental Quality  
4949-A Cox Road  
Glen Allen, VA 23060

**RECEIVED**  
**SEP 17 2009**  
**PRO**

Re: Smurfit-Stone Container Enterprises, Inc., doing business as Smurfit-Stone  
Container Corporation, West Point, Virginia Mill  
Registration 40126  
Clean Air Interstate Rule (CAIR) Permit Application for the No. 8 Power  
Boiler

Dear Mr. Kyle:

The Smurfit-Stone Container Enterprises, Inc. (d/b/a Smurfit-Stone Container Corporation or "Smurfit-Stone") West Point, Virginia Pulp and Paper Mill is submitting the attached CAIR air permit application forms for approval by the Virginia Department of Environmental Quality (DEQ).

In accordance with your August 5, 2009 e-mail to ALL4 Inc.'s Ms. Corey Brandt, this application includes three (3) documents: the CAIR Permit Application Form, the United States Environmental Protection Agency (U.S. EPA) Certificate of Representation Form, and Pages 1-3 of DEQ Form 7. All forms have been filled out with the appropriate information and signed by the designated representative where indicated and are being submitted for DEQ review.

This application covers only Smurfit-Stone's No. 8 Power Boiler, which is designated as Unit 002 in the application forms. Under the current Virginia CAIR regulations in 9 VAC 5-140 Article III, the No. 8 Power Boiler is subject to the CAIR NOx Ozone Season Trading Program; prior to 2009, it was subject to the NOx SIP Call NOx Budget Trading Program in 9 VAC 5-140 Article I. None of Smurfit-Stone's other boilers are subject to CAIR. If any additional information is required, please do not hesitate to contact me regarding this matter.



I certify under penalty of law that this information was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my directions and my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

If you have any questions, please contact Tom Roberts at (804) 843-5484.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Tremblay", with a stylized flourish at the end.

Richard J. Tremblay  
General Manager

Attachment A – DEQ Form 7; Pages 1-3

Attachment B – CAIR Permit Application; Pages 1-4

Attachment C – Certificate of Representation; Pages 1-5

cc: Charles King, Dick Stone (DEQ)  
Eric Schmidt, Stan Brewer, Christopher Bednar (Smurfit-Stone)  
Corey Brandt (ALL4)

File C-03-03-03a

Certified Mail Receipt No. 7007 2680 0002 8206 3966

COMMONWEALTH OF VIRGINIA  
Department of Environmental Quality



AIR PERMIT APPLICATION

*General information*

CHECK ALL FORMS THAT APPLY AND LIST ALL ATTACHED DOCUMENTS.

- |   |  |
|---|--|
| MAP AND LOCALITIES LIST (information), Pages iii-vi                       | ___ PAST ACTUAL ANNUAL CRITERIA POLLUTANT EMISSIONS, Page 15 |
| CONFIDENTIAL INFORMATION, Page vii-viii                                   | ___ TOXIC OR HAP EMISSIONS, Page 16                          |
| FORMULA-BASED HAZARDOUS AIR POLLUTANT INFORMATION, Page ix                | ___ OTHER REGULATED EMISSIONS, Page 17                       |
| HAZARDOUS AIR POLLUTANT LIST (information), Pages xi-xii                  | ___ OPERATING PERIODS, Page 18                               |
| ___ REQUEST FOR LOCAL GOVERNMENT CERTIFICATION FORM, Page xiii            |  |
| <u>1</u> CONTENTS AND DOCUMENT CERTIFICATION, Page 1                      | LIST ATTACHED DOCUMENTS                                      |
| <u>1</u> GENERAL INFORMATION, Page 2                                      | ___ MAP of SITE LOCATION                                     |
| <u>1</u> GENERAL INFORMATION (continued), Page 3                          | ___ FACILITY SITE PLAN                                       |
| ___ FUEL-BURNING EQUIPMENT, Page 4  | ___ PROCESS FLOW DIAGRAM/SCHEMATIC                           |
| ___ PROCESSING, Page 5  | ___ MSDS or CPDS SHEETS                                      |
| ___ INKS, COATINGS, STAINS, AND ADHESIVES, Page 6                         | ___ ESTIMATED EMISSIONS CALCULATIONS                         |
| ___ INCINERATORS, Page 7  | ___ STACK TESTS  |
| ___ VOLATILE ORGANIC COMPOUND/PETROLEUM STORAGE TANKS, Page 8             | ___ AIR MODEL DATA   |
| ___ VOLATILE ORGANIC COMPOUND/PETROLEUM STORAGE TANKS - CONTINUED, Page 9 |  |
| ___ LOADING RACKS AND OIL-WATER SEPARATORS, Page 10                       | <u>EPA Certificate of Representation</u>                     |
| ___ STACK PARAMETERS AND FUEL DATA, Page 11                               | <u>EPA CAIR Permit Application</u>                           |
| ___ AIR POLLUTION CONTROL AND MONITORING EQUIPMENT, PAGE 12               | _____  |
| ___ AIR POLLUTION CONTROL/SUPPLEMENTAL INFORMATION, PAGE 13               | _____  |
| ___ PROPOSED MAXIMUM CRITERIA POLLUTANT EMISSIONS, Page 14                | _____  |

Note added form sheets above; also indicate the number of copies of each form in blank provided.

DOCUMENT CERTIFICATION FORM

(see other side for instructions)

*I certify under penalty of law that this document and all attachments [as noted above] were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

*I certify that I understand that the existence of a permit under [Article 6 of the Regulations] does not shield the source from potential enforcement of any regulation of the board governing the major NSR program and does not relieve the source of the responsibility to comply with any applicable provision of the major NSR regulations.*

SIGNATURE:

A handwritten signature in black ink, appearing to read "Richard J. Tremblay".

DATE: September 15, 2009

NAME:

Richard J. Tremblay

TITLE:

General Manager

REGISTRATION

COMPANY:

Smurfit-Stone Container Enterprises, Inc.

NUMBER: 40126

References: Virginia Regulations for the Control and Abatement of Air Pollution (Regulations), 9 VAC 5-20-230B and 9 VAC 5-80-1140E. See

reverse of this form for instructions.



COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR PERMIT APPLICATION GENERAL INFORMATION

PERSON COMPLETING FORM	DATE	REGISTRATION NUMBER
Tom Roberts	September 15, 2009	40126

REASON(S) FOR SUBMISSION (Check all that apply):

☐ STATE OPERATING PERMIT THIS PERMIT IS APPLIED FOR PURSUANT TO PROVISIONS OF THE VIRGINIA ADMINISTRATIVE CODE, 9 VAC 5 Chapter 80, Article 5 (SOP)

☐ NEW (Greenfield) SOURCE THIS PERMIT IS APPLIED FOR PURSUANT TO THE FOLLOWING PROVISION(S) OF THE VIRGINIA ADMINISTRATIVE CODE:

☐ MODIFICATION of a SOURCE ☐ 9 VAC 5 Chapter 80, Art. 6 (MINOR SOURCES)

☐ RELOCATION of a SOURCE ☐ 9 VAC 5 Chapter 80, Art. 8 (PSD MAJOR SOURCES)

☐ ☐ 9 VAC 5 Chapter 80, Art. 9 (NON-ATTAINMENT MAJOR SOURCES)

☐ Non-Binding Letter of EXEMPTION

☐ AMENDMENT to a Permit dated: Permit type: ☐ SOP (Art. 5) ☐ NSR (Art. 6)

Amendment Type:

☐ Administrative Amendment

☐ Minor Amendment

☐ Significant Amendment

THIS AMENDMENT IS REQUESTED PURSUANT TO THE PROVISIONS OF:

☐ 9 VAC 5-80-970 (SOP Adm.) ☐ 9 VAC 5-80-1270 (NSR Adm.)

☐ 9 VAC 5-80-980 (SOP Minor) ☐ 9 VAC 5-80-1280 (NSR Minor)

☐ 9 VAC 5-80-990 (SOP Sig.) ☐ 9 VAC 5-80-1290 (NSR Sig.)

Complete Pages 1, 2, and 3 and refer to the above checked provisions for additional information requirements. Form 7 pages may be used to satisfy those requirements.

☐ Notification of Change in Ownership - Effective Date: \_\_\_\_\_

☐ Notification of Facility Name Change - Effective Date: \_\_\_\_\_

☐ Notification of Owner Name Change - Effective Date: \_\_\_\_\_

☒ Other (Specify): Clean Air Interstate Rule (CAIR) Permit Application

COMPANY AND DIVISION NAME:

Smurfit-Stone Container Enterprises, Inc. West Point Mill

MAILING ADDRESS:

19<sup>th</sup> and Main Streets, P.O. Box 100, West Point, VA 23181

TELEPHONE NUMBER:

(804) 843-5000

NUMBER OF EMPLOYEES AT SITE:

~502

PROPERTY AREA AT SITE:

~125 acres

EXACT SOURCE LOCATION - INCLUDE NAME OF CITY (COUNTY) AND FULL STREET ADDRESS OR DIRECTIONS:

19<sup>th</sup> and Main Streets, King William County, West Point, VA

PERSON TO CONTACT ON AIR POLLUTION MATTERS - NAME AND

TITLE:

Tom Roberts

Environmental Engineer

PHONE NUMBER: (804) 843-5484

FAX NUMBER: (804) 843-5757

E-MAIL ADDRESS:

tjroberts@smurfit.com

☐ Please check here if you obtained this form from the DEQ website.

FOR OFFICIAL USE ONLY

COUNTY CODE:

PLANT ID NUMBER:

LAT/LONG:

**(for sources covered under a CAIR SIP)**

**For more information, refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321, and 96.322**

**This submission is:**    New    ☒ Revised

**Identify the source by plant name, State, and ORIS or facility code**

Plant Name

ORIS/Facility Code **10017**

**Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)**

[illegible]

**Read the standard requirements and the certification, enter the name of the CAIR designated representative, and sign and date**

**(a) Permit Requirements.**

(i) Submit to the permitting authority a complete CAIR permit application under §96.122, §96.222, and §96.322 (as applicable) in accordance with the deadlines specified in §96.121, §96.221, and §96.321 (as applicable); and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(3) Except as provided in subpart II, III, and IIII (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) that is not otherwise required to have a title V operating permit and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for such CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) and such CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable).

**STEP 3,  
continued**

(b) Monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(2) The emissions measurements recorded and reported in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 shall be used to determine compliance by each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) with the CAIR NO<sub>x</sub> emissions limitation, CAIR SO<sub>2</sub> emissions limitation, and CAIR NO<sub>x</sub> Ozone Season emissions limitation (as applicable) under paragraph (c) of §96.106, §96.206, and §96.306 (as applicable).

(c) Nitrogen oxides emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> allowances available for compliance deductions for the control period under §96.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO<sub>x</sub> units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

(2) A CAIR NO<sub>x</sub> unit shall be subject to the requirements under paragraph (c)(1) of §96.106 for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.170(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR NO<sub>x</sub> allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.106, for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> allowance was allocated.

(4) CAIR NO<sub>x</sub> allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> Allowance Tracking System accounts in accordance with subparts FF, GG, and II of 40 CFR part 96.

(5) A CAIR NO<sub>x</sub> allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO<sub>x</sub> Annual Trading Program. No provision of the CAIR NO<sub>x</sub> Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.105 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO<sub>x</sub> allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EE, FF, GG, or II of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> allowance to or from a CAIR NO<sub>x</sub> source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR NO<sub>x</sub> unit.

Sulfur dioxide emission requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO<sub>2</sub> allowances available for compliance deductions for the control period under §96.254(a) and (b) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO<sub>2</sub> units at the source, as determined in accordance with subpart HHH of 40 CFR part 96.

(2) A CAIR SO<sub>2</sub> unit shall be subject to the requirements under paragraph (c)(1) of §96.206 for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under §96.270(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR SO<sub>2</sub> allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.206, for a control period in a calendar year before the year for which the CAIR SO<sub>2</sub> allowance was allocated.

(4) CAIR SO<sub>2</sub> allowances shall be held in, deducted from, or transferred into or among CAIR SO<sub>2</sub> Allowance Tracking System accounts in accordance with subparts FFF, GGG, and III of 40 CFR part 96.

(5) A CAIR SO<sub>2</sub> allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO<sub>2</sub> Trading Program. No provision of the CAIR SO<sub>2</sub> Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.205 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR SO<sub>2</sub> allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FF, FGG, or III of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR SO<sub>2</sub> allowance to or from a CAIR SO<sub>2</sub> source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR SO<sub>2</sub> unit.

Nitrogen oxides ozone season emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> Ozone Season allowances available for compliance deductions for the control period under §96.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO<sub>x</sub> Ozone Season units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.

(2) A CAIR NO<sub>x</sub> Ozone Season unit shall be subject to the requirements under paragraph (c)(1) of §96.306 for the control period starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NO<sub>x</sub> Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.306, for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> Ozone Season allowance was allocated.

(4) CAIR NO<sub>x</sub> Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> Ozone Season Allowance Tracking System accounts in accordance with subparts FFFF, GGGG, and IIII of 40 CFR part 96.

(5) A CAIR NO<sub>x</sub> allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO<sub>x</sub> Ozone Season Trading Program. No provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.305 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO<sub>x</sub> allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> Ozone Season allowance to or from a CAIR NO<sub>x</sub> Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

**STEP 3,  
continued**

(d) Excess emissions requirements.

If a CAIR NO<sub>x</sub> source emits nitrogen oxides during any control period in excess of the CAIR NO<sub>x</sub> emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO<sub>x</sub> unit at the source shall surrender the CAIR NO<sub>x</sub> allowances required for deduction under §96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR SO<sub>2</sub> source emits sulfur dioxide during any control period in excess of the CAIR SO<sub>2</sub> emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO<sub>2</sub> unit at the source shall surrender the CAIR SO<sub>2</sub> allowances required for deduction under §96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR NO<sub>x</sub> Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NO<sub>x</sub> Ozone Season emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall surrender the CAIR NO<sub>x</sub> Ozone Season allowances required for deduction under §96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

(i) The certificate of representation under §96.113, §96.213, and §96.313 (as applicable) for the CAIR designated representative for the source and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under §96.113, §96.213, and §96.313 (as applicable) changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96, provided that to the extent that subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable).

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable).

(2) The CAIR designated representative of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) and each CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) at the source shall submit the reports required under the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable) including those under subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(f) Liability.

(1) Each CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) and each NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) shall meet the requirements of the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable).

(2) Any provision of the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable) that applies to a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NO<sub>x</sub> units, CAIR SO<sub>2</sub> units, and CAIR NO<sub>x</sub> Ozone Season units (as applicable) at the source.

(3) Any provision of the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable) that applies to a CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) or the CAIR designated representative of a CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) shall also apply to the owners and operators of such unit.

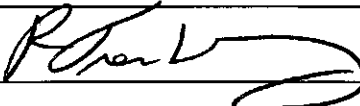
**STEP 3,  
continued**

(g) Effect on Other Authorities.

No provision of the CAIR NO<sub>x</sub> Annual Trading Program, CAIR SO<sub>2</sub> Trading Program, and CAIR NO<sub>x</sub> Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under § 96.105, §96.205, and §96.305 (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO<sub>x</sub> source, CAIR SO<sub>2</sub> source, and CAIR NO<sub>x</sub> Ozone Season source (as applicable) or CAIR NO<sub>x</sub> unit, CAIR SO<sub>2</sub> unit, and CAIR NO<sub>x</sub> Ozone Season unit (as applicable) from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

**Certification**

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

<b>Richard J. Tremblay</b>	
Name	
Signature 	Date 9/15/09



# Certificate of Representation

Page 1

For more information, see instructions and 40 CFR 72.24, 40 CFR 96.113, 96.213, or 96.313, or a comparable state regulation under the Clean Air Interstate Rule (CAIR) NO<sub>x</sub> Annual, SO<sub>2</sub>, and NO<sub>x</sub> Ozone Season Trading Programs or 40 CFR 97.113, 97.213, or 97.313

## FACILITY (SOURCE) INFORMATION

This submission is ☐ New ☒ Revised (revised submissions must be complete, see instructions)

### STEP 1 Provide information for the facility (source).

Facility (Source) <b>Smurfit-Stone Container Enterprises, Inc.</b>		State <b>VA</b>	Plant Code <b>10017</b>
County Name <b>King William</b>			
Latitude <b>37° 32' 22"</b>		Longitude <b>076° 48' 18"</b>	

### STEP 2 Enter requested information for the designated representative.

Name <b>Richard J. Tremblay</b>		Title <b>General Manager</b>
Company Name <b>Smurfit-Stone Container Enterprises, Inc.</b>		
Address <b>19<sup>th</sup> and Main Streets, P.O. Box 100, West Point, VA 23181</b>		
Phone Number <b>(804) 843-5885</b>		Fax Number <b>(804) 843-5369</b>
E-mail address <b>rtremblay@smurfit.com</b>		

### STEP 3 Enter requested information for the alternate designated representative.

Name <b>Stan Brewer</b>		Title <b>Environmental Manager</b>
Company Name <b>Smurfit-Stone Container Enterprises, Inc.</b>		
Address <b>19<sup>th</sup> and Main Streets, P.O. Box 100, West Point, VA 23181</b>		
Phone Number <b>(804) 843-5270</b>		Fax Number <b>(804) 843-5369</b>
E-mail address <b>sbrewer@smurfit.com</b>		

**Smurfit-Stone Container Enterprises, Inc.--West Point Mill**

Facility (Source) Name (from Step 1)

**UNIT INFORMATION**

**STEP 4: Complete one page for each unit located at the facility identified in STEP 1** (i.e., for each boiler, simple cycle combustion turbine, or combined cycle combustion turbine). Do not list duct burners. Indicate each program to which the unit is subject, and enter all other unit-specific information, including the name of each owner and operator of the unit and the generator ID number and nameplate capacity of each generator served by the unit. If the unit is subject to a program, then the facility (source) is also subject. (For units subject to the NO<sub>x</sub> Budget Trading Program, a separate "Account Certificate of Representation" form must be submitted to meet requirements under that program.)

**Applicable Program(s):** ☐ Acid Rain ☐ CAIR NO<sub>x</sub> Annual ☐ CAIR SO<sub>2</sub> ☒ CAIR NO<sub>x</sub> Ozone Season

Unit ID#	Unit Type	Source Category	Generator ID Number (Maximum 8 characters)	Acid Rain Nameplate Capacity (MWe)	CAIR Nameplate Capacity (MWe)
002	(No. 8 Power Boiler)	Pulp and Paper Mill			
		NAICS Code 322130			
Date unit began (or will begin) serving any generator producing electricity for sale (including test generation) (mm/dd/yyyy)		Check One Actual <input checked="" type="checkbox"/> Projected <input type="checkbox"/>			
Company Name <b>Smurfit-Stone Container Enterprises, Inc.</b>					
Company Name ~ Owner ~ Operator					
Company Name ~ Owner ~ Operator					
Company Name ~ Owner ~ Operator					
Company Name ~ Owner ~ Operator					
Company Name ~ Owner ~ Operator					

**STEP 5: Read the appropriate certification statements, sign, and date.**

**Acid Rain Program**

I certify that I was selected as the designated representative or alternate designated representative (as applicable) by an agreement binding on the owners and operators of the affected source and each affected unit at the source (i.e., the source and each unit subject to the Acid Rain Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and each affected unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the affected source and each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the affected source and each affected unit at the source; and

Allowances, and proceeds of transactions involving allowances, will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of allowances, allowances and proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

**Clean Air Interstate Rule (CAIR) NO<sub>x</sub> Annual Trading Program**

I certify that I was selected as the CAIR designated representative or alternate CAIR designated representative (as applicable), by an agreement binding on the owners and operators of the CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source (i.e., the source and each unit subject to the CAIR NO<sub>x</sub> Annual Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the CAIR NO<sub>x</sub> Annual Trading Program on behalf of the owners and operators of the CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a CAIR NO<sub>x</sub> unit, or where a utility or industrial customer purchases power from a CAIR NO<sub>x</sub> unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the CAIR designated representative or alternate CAIR designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source; and

CAIR NO<sub>x</sub> allowances and proceeds of transactions involving CAIR NO<sub>x</sub> allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of CAIR NO<sub>x</sub> allowances by contract, CAIR NO<sub>x</sub> allowances and proceeds of transactions involving CAIR NO<sub>x</sub> allowances will be deemed to be held or distributed in accordance with the contract.



Clean Air Interstate Rule (CAIR) SO<sub>2</sub> Trading Program

I certify that I was selected as the CAIR designated representative or alternate CAIR designated representative (as applicable), by an agreement binding on the owners and operators of the CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source (i.e., the source and each unit subject to the SO<sub>2</sub> Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the CAIR SO<sub>2</sub> Trading Program, on behalf of the owners and operators of the CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a CAIR SO<sub>2</sub> unit, or where a utility or industrial customer purchases power from a CAIR SO<sub>2</sub> unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the CAIR designated representative or alternate CAIR designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source; and

CAIR SO<sub>2</sub> allowances and proceeds of transactions involving CAIR SO<sub>2</sub> allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of CAIR SO<sub>2</sub> allowances by contract, CAIR SO<sub>2</sub> allowances and proceeds of transactions involving CAIR SO<sub>2</sub> allowances will be deemed to be held or distributed in accordance with the contract.

Clean Air Interstate Rule (CAIR) NO<sub>x</sub> Ozone Season Trading Program

I certify that I was selected as the CAIR designated representative or alternate CAIR designated representative (as applicable), by an agreement binding on the owners and operators of the CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source (i.e., the source and each unit subject to the CAIR NO<sub>x</sub> Ozone Season Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the CAIR NO<sub>x</sub> Ozone Season Trading Program on behalf of the owners and operators of the CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a CAIR NO<sub>x</sub> Ozone Season unit, or where a utility or industrial customer purchases power from a CAIR NO<sub>x</sub> Ozone Season unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the CAIR designated representative or alternate CAIR designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit; and


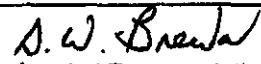
CAIR NO<sub>x</sub> Ozone Season allowances and proceeds of transactions involving CAIR NO<sub>x</sub> Ozone Season allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of CAIR NO<sub>x</sub> Ozone Season allowances by contract, CAIR NO<sub>x</sub> Ozone Season allowances and proceeds of transactions involving CAIR NO<sub>x</sub> Ozone Season allowances will be deemed to be held or distributed in accordance with the contract.

**Smurfit-Stone Container Enterprises, Inc.--West Point Mill**  
Facility (Source) Name (from Step 1)

Certificate of Representation - Page 5

General

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature (Designated Representative)  Richard J. Tremblay	Date 6/4/2009.
Signature (Alternate Designated Representative)  Stan Brewer	Date 06/04/09